



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Ms. Michelle Eaglin
Environmental Manager
Rubicon, LLC
P.O. Box 517
Geismar, LA 70734

1 JUL 17 2008

RE: Rubicon, LLC
AI#1468/LAD008213191-OP-RN-1/ PER20030014
Draft Hazardous Waste Operating Renewal Permit

Dear Ms. Eaglin:

Attached is your copy of the Rubicon, LLC draft hazardous waste operating renewal permit (LAD008213191-OP-RN-1), which contains language pertaining to the operation of three (3) combustion units, hazardous waste storage/treatment tanks and a container storage area at the Geismar Facility.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste operating renewal permit. A public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing and specific dates for the beginning and ending of the comment period are contained in the attached public notice.

Prior to taking final action on the draft hazardous waste operating renewal permit, the Administrative Authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision will be in accordance with LAC 33:V.705.

Please reference your Agency Interest Number (1468), EPA ID Number (LAD008213191), and the Permit Activity Number (PER20030014) on all future correspondence pertaining to this matter. If you have any questions, please contact Mr. Keith R. Williams of the Waste Permits Division at (225) 219-3011 or Ms. Soumaya Ghosn of the Public Participation Group at (225) 219-3276.

Sincerely,

A handwritten signature in black ink, appearing to read "Bijan Sharafkhani".

Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

krw

Attachment

c: Michael Carrillo – USEPA, Region 6

Rubicon, LLC /AI #1468/ PER20030014

Geismar Facility

Permit Number LAD008213191-OP-RN-1

Draft Hazardous Waste Operating Permit for 3-Combustion Units (Aniline 2 Boiler, DPA 1 and DPA 2 Superheaters), 19-Tanks and 1-Container Storage Area

SUMMARY

Permit Background

Rubicon LLC, is a chemical manufacturing facility that has been in operation since 1966. The facility, located in Geismar, Louisiana, Ascension Parish, produces nitrobenzene (NB), aniline, diaminodiphenyl methane (DADPM), pure and polymeric methylenediphenyl diisocyanate (MDI), phosgene, diphenylamine (DPA) and polyols. The draft hazardous waste operating renewal permit is applicable to the Aniline 2 BIF unit, DPA 1 and DPA 2 Superheaters, Permitted Container Storage Area, and Tanks MS-431, 438, 603, 2303, 2207, 2230, 8632, 8648; MF-8275, 8603, 8616, 8638A, 8638B, 8638C; GF-8189A, 8189B, 8189C, 8189D and 8189E. The original operating permit became effective on January 17, 1994, and expired on January 17, 2004. In October, 1994, a Class 3 Modification was approved to add the three (3) combustion units mentioned above and the TDI Boiler. The TDI Boiler was cleaned closed in October, 2006.

The only outstanding issue of this permit is a Compliance Order issued by the Enforcement Division to Rubicon on October 6, 2006, after an inspection revealed that the facility was in violation of Condition V.A.1 of its hazardous waste permit (Permit # LAD008213191-P1) and LAC 33:V.1907.E.1.d (Federal equivalent-40CFR 264.193(e)(2)(iv)). LAC 33:V.1907.E.1.d requires the installation of an external liner to surround the tank system. Eighteen (18) of the twenty-one (21) tanks were found to have deficient external liners. Those particular tanks had liners that were composed of concrete, which is porous and absorbent by nature. It is the Department's position as well as the USEPA that concrete alone cannot act as an external liner capable of preventing lateral and vertical migration of any release of hazardous waste from the tanks. Rubicon filed a request for a hearing on November 13, 2006, which was granted on November 28, 2006. Attorneys for Rubicon and the Department have presented their cases in an initial status conference on April 21, 2008, at the Division of Administrative Law (DAL) and is awaiting the Motion for Summary Judgement from the Judge.

This operating renewal permit will not contain Conditions VII (HSWA) and VIII (Corrective Action Strategy-CAS). Rubicon has submitted a post-closure renewal application for the North/South Ponds (July 2007-PER20070031). The draft post-closure renewal permit prepared from this renewal application will contain permit conditions and financial assurance for corrective action activities at the site when the final post-closure permit is issued at a later date.

Keith R. Williams
ES III

FACT SHEET

FACT SHEET

**FOR THE DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT
PREPARED FOR**

**Rubicon, LLC
Geismar Facility**

**EPA ID # LAD008213191
Agency Interest # 1468
PER20030014**

**Geismar, Louisiana
Ascension Parish**

Permit Number LAD008213191-OP-RN-1

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste operating renewal permit for Rubicon LLC, EPA ID Number LAD008213191, Agency Interest Number 1468, for the facility located in Geismar, Ascension Parish, Louisiana.

Rubicon LLC is seeking to renew its hazardous waste operating permit governing the operating activities of the Aniline 2 BIF unit, DPA 1 Superheater and DPA 2 Superheater units, storage and treatment tanks and a container storage area at its Geismar Facility.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste operating renewal permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA).

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permit decision process. The LDEQ's Office of Environmental Services - Waste Permits Division (OES-WPD) is required to prepare this draft hazardous waste renewal permit. The permit sets forth all the applicable conditions, which the Permittee is required to comply with during the life of the permit. Rubicon LLC submitted its Hazardous Waste Part B Operating Renewal Permit Application, dated August, 2003, and 2007, 2008 Addendums to the 2003 submittal to comply with the hazardous waste regulations as per Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the Permittee to comply with the requirements of the LAC 33:V.Subpart 1.

The public is given a minimum of forty-five (45) days to review and comment on the draft operating renewal permit. The Administrative Authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the draft operating renewal permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operational activities of the listed facilities.

This draft hazardous waste renewal permit is a tentative determination and is not the final decision of the Administrative Authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Rubicon, LLC, Geismar Facility must do so within the allotted forty-five (45) day comment period.

A public hearing will be held on the date, at the location and time provided in the public notice of the hearing. LDEQ will hold the hearing within forty-five (45) days after public notice of the hearing.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft operating renewal permit, fact sheet, and supporting documents are available for review at the **Ascension Parish Library-Gonzales Branch, 708 S. Irma Blvd., Gonzales, LA 70737** and the **Iberville Parish Library - East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776**.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft operating permit to the Administrative Authority, at the address listed below, no later than 12:30 p.m. on the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals, who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. Keith R. Williams
Louisiana Department of Environmental Quality
Office of Environmental Services
Water and Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3011 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

Rubicon LLC is a chemical manufacturing facility that produces nitrobenzene (NB), aniline, diaminodiphenyl methane (DADPM), pure and polymeric methylenediphenyl diisocyanate (MDI), phosgene, diphenylamine (DPA) and polyols. The facility is located in Geismar, Louisiana, Ascension Parish, comprised of a 31.425 acre tract and a 50.005 acre tract located in Section 11, Township 10 South-Range 2 East.

IV. HAZARDOUS WASTE FACILITIES

This draft hazardous waste operating renewal permit is only applicable to the Aniline 2 BIF unit, DPA 1 and DPA 2 Superheaters, Permitted Container Storage Area, and Tanks MS-431, 438, 603, 2303, 2207, 2230, 8632, 8648; MF-8275, 8603, 8616, 8638A, 8638B, 8638C; GF-8189A, 8189B, 8189C, 8189D and 8189E.

Rubicon LLC also submitted on July 31, 2007, a hazardous waste post-closure renewal permit application for two (2) closed surface impoundments – North and South Ponds previously permitted in December, 1997. A decision on the post-closure renewal permit will be made at a later date by the Administrative Authority. Corrective Action activities under HSWA (Hazardous and Solid Waste Amendments) will also be addressed in the post-closure renewal permit.

V. FINANCIAL AND LIABILITY REQUIREMENTS

Rubicon LLC has submitted documentation to satisfy the financial assurance requirements of LAC 33:V.Chapter 37.

VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

In accordance with the requirements set forth by the Louisiana Supreme Court in (Save Ourselves v. La. Env'tl. Control Comm'n 1152 (La. 1983)). The LDEQ has considered factors in the draft decision on this renewal operating permit. This is a preliminary analysis based on information currently available to the LDEQ.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

Rubicon LLC is an existing chemical manufacturing site and a permitted Treatment, Storage and Disposal (TSD) facility. A hazardous waste operating permit was issued on January 17, 1994. Rubicon LLC has developed a training program and contingency plans that are updated as needed to minimize impacts to the environment and/or to personnel. This permit does not propose the alteration of waste classifications, codes or characteristics. The design and operational procedures associated with this permit will comply with all regulatory and permit requirements to prevent the non-compliant release of any material into the environment.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

Rubicon LLC provides major social and economic benefits to the local community while causing minimal environmental impact costs through the operation of the plant. Public (i.e., local community) costs will not be affected by the continuing operation of the facility. Rubicon LLC pays federal, state and local taxes that assist in the maintenance of certain public sectors of the local community.

Rubicon LLC produces valuable products for society and has demonstrated the social and economic benefits for over forty (40) years. Rubicon LLC received the 1998 Governor's Environmental Leadership Recognition Award for its community outreach programs.

C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

1. ALTERNATIVE PROJECTS

Rubicon LLC, a TSD facility, is an existing manufacturer of chemical products. On-site treatment (BIF's, pre-dedicated tanks), storage (tanks and container storage area) and disposal (deepwell injection) lessens the exposure of hazardous waste to the public and environment, and the need for extensive transportation to commercial off-site permitted disposal facilities. There appears to be no known alternative projects that would offer more protection to the environment.

2. ALTERNATIVE SITE

This draft operating renewal permit is for an existing facility that has been operational for forty (40) years. This facility at this site offers more protection to the environment than any reasonable alternative. Since the facility is located in an existing industrial area, no zoning or land use plans will be disturbed. An alternative site is not practical and would unduly curtail non-environmental benefits.

3. MITIGATING MEASURES

On-going mitigating measures include a plant wide waste minimization program. Emissions to air, ground and water has been reduced significantly over the past ten (10) years. The program has been constantly reducing the plant's environmental impact and is committed to continued efforts on reducing emissions to all media. No other mitigating measures would offer more protection to the environment.

SIGNATURE PAGE

DRAFT
HAZARDOUS WASTE OPERATING RENEWAL PERMIT
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT
FOR HAZARDOUS WASTE STORAGE AND COMBUSTION

PERMITTEE: RUBICON, LLC

PERMIT NUMBER: LAD 008213191-OP-RN-1
Agency Interest #1468/Activity # PER 20030014

FACILITY LOCATION: 9156 HIGHWAY 75
P.O. BOX 517
GEISMAR, ASCENSION PARISH, LOUISIANA, 70734

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 30:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to Rubicon, LLC, (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage, and Disposal facility (TSD) Louisiana, at latitude 30° 12' 5" and longitude 91° 0' 41".

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations contained in the Louisiana Administrative Code, Title 33, Part V, Subpart 1, (LAC 33:V.Subpart 1). Applicable regulations are those that are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate.

Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application that would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of _____, and shall remain in effect until _____, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the Secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

DRAFT
Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

Date

PUBLIC PARTICIPATION

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 16, 2008

Iberville Parish Library
Attn: Ms. Lydia Haydel, Branch Manager
East Iberville Branch
5715 Monticello Street
St. Gabriel, LA 70776

Phone: (225) 642-8380
Fax: (225) 642-8381

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Ms. Haydel:

We request that the enclosed Public Notice, 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents associated with the above referenced facility, be made available for public review upon receipt in the at the **Iberville Parish Library, East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776.**

It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

These documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached "Verification by Library" form and mail it to: Calvin Fair, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or Fax it to: (225) 219-3309.

July 16, 2008

Page 2

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3283 or e-mail me at Calvin.Fair@LA.GOV.

Sincerely,

A handwritten signature in black ink that reads "Calvin E. Fair". The signature is written in a cursive, flowing style.

Calvin Fair
Environmental Project Specialist
Public Participation Group
CF
Attachments

VERIFICATION BY LIBRARY

The undersigned verifies that the Iberville Parish Library, East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776, has received a copy of the Public Notice announcing a Public Hearing and Request for Public Comment, and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents regarding the facility referenced below:

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Iberville Parish Library:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Calvin Fair
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3283
Fax: (225) 325-8159

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 16, 2008

Ascension Parish Library
Attn: Ms. Angelle Deshautelles, Director
Gonzales Branch
708 South Irma Boulevard
Gonzales, LA 70737

Phone: (225) 647-8924
Fax: (225) 644-0063

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Ms. Deshautelles:

We request that the enclosed Public Notice, 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents associated with the above referenced facility, be made available for public review upon receipt in the at the **Ascension Parish Library, Gonzales Branch, 708 S. Irma Blvd., Gonzales, LA 70737.**

It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

These documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached "Verification by Library" form and mail it to: Calvin Fair, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or Fax it to: (225) 219-3309.

July 16, 2008

Page 2

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3283 or e-mail me at Calvin.Fair@LA.GOV.

Sincerely,

Calvin E. Fair

Calvin Fair
Environmental Project Specialist
Public Participation Group
CF
Attachments

VERIFICATION BY LIBRARY

The undersigned verifies that the Ascension Parish Library, Gonzales Branch, 708 S. Irma Blvd., Gonzales, LA 70737, has received a copy of the Public Notice announcing a Public Hearing and Request for Public Comment, and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents regarding the facility referenced below:

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Ascension Parish Library:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Calvin Fair
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3283
Fax: (225) 325-8159

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 16, 2008

LDEQ
Attn: Mr. Bobby Mayweather, Manager
Capital Regional Office
PO Box 4312
Baton Rouge, LA 70821-4312

Phone: (225) 219-3600
Fax: (225) 219-3695
E-mail: Bobby.Mayweather@LA.Gov

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Mr. Mayweather:

Enclosed is a copy of the Public Notice and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit for the above referenced facility.

The Public Notice is scheduled to publish in The Gonzales Weekly Citizen and The Advocate on Friday, July 18, 2008.

Should you have any questions regarding the facility, or need additional information regarding this permit action, please contact Mr. Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3011.

Sincerely,

A handwritten signature in cursive script that reads "Calvin E. Fair".

Calvin Fair
Environmental Project Specialist
Public Participation Group

CF
Enclosures

VERIFICATION BY CAPITAL REGIONAL OFFICE

The undersigned verifies that the LDEQ, Capital Regional Office has received a copy of the Public Notice and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit regarding:

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

LDEQ, Capital Regional Office

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Mr. Calvin Fair
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE: (225) 219-3283
FAX: (225) 325-8159, or
FAX: (225) 219-3309

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

July 16, 2008

Honorable Tommie Martinez, President
ATTN: Ms. Suzanne Patterson, Secretary
Ascension Parish Police Jury
208 East Railroad Street
Gonzales, LA 70737

Phone: (225) 621-5709
Fax: (225) 644-6479
E-mail: SPatterson@APGov.US

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear President Martinez:

The Louisiana Department of Environmental Quality (LDEQ) will conduct a **Public Hearing** on **Tuesday, September 16, 2008, at the Geismar Community Center, 12060 Highway 73, Geismar, LA 70734**, to receive public comments regarding a **Draft Hazardous Waste Operating Renewal Permit for Rubicon, LLC, Geismar Facility, AI #1468**.

The Public Hearing will begin at 6:00 p.m., and will end at an unspecified time later that evening.

For your reference, I am attaching a copy of the Public Notice that is scheduled to be published on **Friday, July 18, 2008, in The Gonzales Weekly Citizen**, of Gonzales, and also in **The Advocate**, of Baton Rouge, LA.

Along with the above referenced Public Notice, I am including copies of the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents associated with the above referenced facility.

Should you have any questions regarding this permit action, additional permit information may be obtained from Mr. Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3011.

July 16, 2008

Page 2

Should you have any questions regarding the Public Hearing, please contact me at LDEQ, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3283, or by e-mail at Calvin.Fair@LA.GOV.

Sincerely,

A handwritten signature in cursive script that reads "Calvin E. Fair".

Calvin Fair
LDEQ, Public Participation Group

CF / Attachment

**VERIFICATION BY THE
ASCENSION PARISH POLICE JURY**

The undersigned verifies that the Ascension Parish Police Jury, 208 East Railroad Street, Gonzales, LA 70737, has received a copy of the Public Notice announcing a Public Hearing and Request for Public Comment, and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, and related documents regarding the facility referenced below:

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Ascension Parish Police Jury:

By:_____ **Date:**_____

Please complete and return this form promptly to the address listed below:

Calvin Fair
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3283

Fax: (225) 325-8159

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 16, 2008

Phone: (214) 665-6669

Mr. Kishor Fruitwala
U. S. EPA, Region VI
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Mr. Fruitwala:

Enclosed is a copy of the Public Notice and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit for the above referenced facility.

The Public Notice is scheduled to publish in The Gonzales Weekly Citizen and The Advocate on Friday, July 18, 2008.

Should you have any questions regarding the facility, or need additional information regarding this permit action, please contact Mr. Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3011.

Sincerely,

A handwritten signature in cursive script that reads "Calvin E. Fair".

Calvin Fair
Environmental Project Specialist
Public Participation Group

/CF

Enclosures

VERIFICATION BY EPA REGION VI OFFICE

The undersigned verifies that the EPA Region VI Office has received a copy of the Public Notice and the 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit regarding:

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

EPA Region VI Office

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Mr. Calvin Fair
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE: (225) 219-3283
FAX: (225) 325-8159, or
FAX: (225) 219-3309

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 15, 2008

Phone: (225) 383-1111
Fax: (225) 388-0164
E-mail: Legal.Ads@TheAdvocate.com

Ms. Susan Bush
Legal Advertising
The Advocate
P.O. Box 588
Baton Rouge, LA 70821-0588

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in The Advocate on **Friday, July 18, 2008**. I will also send you a copy of the legal notice via e-mail at Legal.Ads@TheAdvocate.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this Department to be assured that adequate notification is provided, we request that you sign and date the enclosed 'Verification by Newspaper' form, and fax it to the attention of Calvin Fair at (225) 219-3309 immediately upon publication. If the notice cannot be published on the date requested, please immediately contact Mr. Fair at (225) 219-3283 or email Calvin.Fair@LA.GOV.

The invoice for this public notice should be sent to:

Ms. Michelle Eaglin, Environmental Engineering Manager
Rubicon, LLC
Geismar Facility
P.O. Box 517
Geismar, LA 70734
(225) 242-5590 - Phone
(225) 673-2470 - Fax

PLEASE NOTE: We no longer require an affidavit as proof of publication.

July 15, 2008

Page 2

PLEASE NOTE: We no longer require an affidavit as proof of publication.

Official Proof of Publication of this Public Notice in the form of:

(1) a Tear Sheet from the newspaper that shows the name of the newspaper and date of publication;

or

(2) the complete page on which the Public Notice was published, also showing the name of the newspaper and the date of publication,
should be sent to:

Calvin Fair, LDEQ
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, LA 70821-4313.

However, on the date of publication, please continue faxing us
the "VERIFICATION BY NEWSPAPER" form (see next page), along with a copy of the
Tear Sheet of the Public Notice., **OR**, you could send an e-mail with an attached PDF version of the page of the newspaper that contains the referenced Public Notice, which (of course) shows the Newspaper Name, Date, and Page #.

Thank you for assisting in our effort to serve the public.

Sincerely,



Calvin Fair
Environmental Project Specialist
Public Participation Group

CF
Attachments

VERIFICATION BY NEWSPAPER
For Publication on Friday, July 18, 2008

Immediately upon publication **please fax this form, along with a copy of the public notice** as it appeared in the newspaper, **to Calvin Fair at: (225) 219-3309.**

The undersigned verifies that the following public notice was published in the _____ (date of publication) edition of **The Advocate:**

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

The Advocate:

By: _____ Date: _____

PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING PROOF OF PUBLICATION, IN THE FORM OF EITHER A TEAR SHEET OF THE PUBLIC NOTICE that shows the name of the newspaper and date of publication;

OR, THE COMPLETE PAGE ON WHICH THE PUBLIC NOTICE IS PUBLISHED, also showing the name of the newspaper and the date of publication, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 15, 2008

Phone: (225) 644-6397
Fax: (225) 644-2069
E-mail: Graphics2@WeeklyCitizen.com

Ms. Aanifa LeBlanc
Legal Advertising
The Gonzales Weekly Citizen
P.O. Box 430
(231 West Cornerview Road)
Gonzales, LA 70707-0430

Re: Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

Dear Ms. LeBlanc:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in **The Gonzales Weekly Citizen** on **Friday, July 18, 2008**. I will also send you a copy of the legal notice via e-mail at Graphics2@WeeklyCitizen.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this Department to be assured that adequate notification is provided, we request that you sign and date the enclosed 'Verification by Newspaper' form, and fax it to the attention of Calvin Fair at (225) 219-3309 immediately upon publication. **If the notice cannot be published on the date requested, please immediately contact Mr. Fair at (225) 219-3283 or email Calvin.Fair@LA.GOV.**

The invoice for this public notice should be sent to:

Ms. Michelle Eaglin, Environmental Engineering Manager
Rubicon, LLC
Geismar Facility
P.O. Box 517
Geismar, LA 70734
(225) 242-5590 - Phone
(225) 673-2470 - Fax

PLEASE NOTE: We no longer require an affidavit as proof of publication.

July 15, 2008
Page 2

PLEASE NOTE: We no longer require an affidavit as proof of publication.

Official Proof of Publication of this Public Notice in the form of:

(1) a **Tear Sheet** from the newspaper that shows the name of the newspaper and date of publication;

or

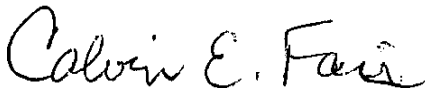
(2) the **complete page** on which the Public Notice was published, also showing the name of the newspaper and the date of publication, **should be sent to:**

Calvin Fair, LDEQ
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, LA 70821-4313.

However, on the date of publication, please continue faxing us
the "VERIFICATION BY NEWSPAPER" form (see next page), along with a copy of the
Tear Sheet of the Public Notice., OR, you could send an e-mail with an attached PDF version of the page of the newspaper that contains the referenced Public Notice, which (of course) shows the Newspaper Name, Date, and Page #.

Thank you for assisting in our effort to serve the public.

Sincerely,



Calvin Fair
Environmental Project Specialist
Public Participation Group

CF
Attachments

VERIFICATION BY NEWSPAPER
For Publication on Friday, July 18, 2008

Immediately upon publication **please fax this form, along with a copy of the public notice** as it appeared in the newspaper, **to Calvin Fair at: (225) 219-3309.**

The undersigned verifies that the following public notice was published in the _____ (date of publication) edition of **The Gonzales Weekly Citizen:**

Public Hearing and Request for Public Comment on
A Draft Hazardous Waste Operating Renewal Permit for
Rubicon, LLC
Geismar Facility
Agency Interest (AI) No. 1468, LAD 008213191-OP-RN-1, PER20030014

The Gonzales Weekly Citizen:

By: _____ Date: _____

PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING PROOF OF PUBLICATION, IN THE FORM OF EITHER A TEAR SHEET OF THE PUBLIC NOTICE that shows the name of the newspaper and date of publication;

OR, THE COMPLETE PAGE ON WHICH THE PUBLIC NOTICE IS PUBLISHED, also showing the name of the newspaper and the date of publication, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
RUBICON, LLC
GEISMAR FACILITY
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON A
DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a Public Hearing to receive comments on a draft hazardous waste operating renewal permit for Rubicon, LLC, Geismar Facility, P.O.Box 517, Geismar, LA 70734, for the following 3 BIF Units, 1 Container Storage Area, and 19 Tanks:

Aniline 2 BIF Unit, DPA 1 Superheater, DPA 2 Superheater,

Permitted Container Storage Area,

MS-431, MS-438, MS-603, MS-2303, MS-2207, MS-2230, MF-8603, MF-8616, MF-8638A, MF-8638B, MF-8638C, MF-8275, MS-8632, MS-8648, GF-8189A, GF-8189B, GF-8189C, GF-8189D, GF-8189E.

The facility is located at 9156 Hwy. 75, Geismar, LA, 70734, Ascension Parish.

The hearing will be held on **Tuesday, September 16, 2008, beginning at 6:00 p.m., at the Geismar Community Center, 12060 Highway 73, Geismar, LA 70734.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

Rubicon, LLC is a chemical manufacturer, and a permitted treatment, storage, and disposal facility. Rubicon, LLC proposes to renew its Hazardous Waste Operating Permit for the units referenced above. The previous permit was issued and became effective on January 17, 1994.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Wednesday, September 17, 2008.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The 2003 Hazardous Waste Operating Renewal Permit Application, the 2007 and 2008 Addendums to the 2003 Renewal Permit Application, and the Draft Hazardous Waste Operating Renewal Permit, are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the Ascension Parish Library, Gonzales Branch, 708 S. Irma Blvd., Gonzales, LA 70737 and the Iberville Parish Library, East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776.

Individuals with a disability, who need an accommodation in order to participate in the public hearings, should contact Calvin Fair at the above address or by phone at (225) 219-3283.

Inquiries or requests for additional information regarding this permit action should be directed to Mr. Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3011.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 1468, Permit Number LAD 008213191-OP-RN-1, and Activity Number PER20030014.

Scheduled Publication Date: Friday, July 18, 2008

PART A

APPLICATION

<p>MAIL THE COMPLETED FORM TO: The appropriate EPA Regional or State Office.</p>	<p align="center">United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM - 2006</p>	
<p>Reason for Submittal (see instructions on page 9)</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>A. Reason for Submittal:</p> <p><input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste or used oil activities).</p> <p><input type="checkbox"/> To provide subsequent notification (to update site identification information).</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application.</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #)</p> <p><input type="checkbox"/> As a component of Hazardous Waste Report.</p>	
<p>2. Site EPA ID Number (page 10)</p>	<p>EPA ID Number:</p> <p align="center">LAD008213191</p>	
<p>3. Site Name (page 10)</p>	<p>Site Name:</p> <p align="center">Rubicon LLC</p>	
<p>4. Site Location Information (page 10)</p>	<p>Street Address: 9156 Highway 75</p>	
	<p>City, Town or Village: Geismar</p>	<p>State: LA</p>
	<p>County Name: ASCENSION</p>	<p>Zip Code: 70734</p>
<p>5. Site Land Type (page 10)</p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>	
<p>6. North American Industry Classification System (NAICS) Code(s) for the Site (page 10)</p>	<p>A.</p> <p align="center">325192</p>	<p>B.</p> <p align="center">325211</p>
	<p>C.</p> <p align="center">325199</p>	<p>D.</p>
	<p>Street or P.O. Box: P. O. Box 517</p>	
	<p>City, Town or Village: Geismar</p>	
<p>7. Site Mailing Address (page 11)</p>	<p>State: LA</p>	
	<p>Country: UNITED STATES</p>	
	<p>Zip Code: 70734</p>	
	<p>First Name: Michelle MI: B Last Name: Eaglin</p>	
<p>8. Site Contact Person (page 11)</p>	<p>Phone Number: 2252425590 Extension:</p>	
	<p>Email Address: michelle_b_eaglin@huntsman.com</p>	
<p>9. Operator and Legal Owner of the Site (pages 11 and 12)</p>	<p>Name of Site's Operator: Rubicon LLC</p>	
	<p>Date Became Operator (mm/dd/yyyy): 12/24/2003</p>	
	<p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>	
	<p>Name of Site's Legal Owner: Rubicon LLC</p>	
<p>Date Became Owner (mm/dd/yyyy): 12/24/2003</p>		
<p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

EPA ID NO. 8220000210191

OMB# 2050-0024 Expires 10/31/2007

9. Legal Owner (Continued) Address	Street or P.O. Box: P. O. Box 517	
	City, Town or Village: Geismar	
	State: LA	
	Country: UNITED STATES	Zip Code: 70734

10. Type of Regulated Waste Activity
 Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 13 to 16)

A. Hazardous Waste Activities
 Complete all parts for 1 through 6.

1. Generator of Hazardous Waste
 If "Yes", choose only one of the following - a, b or c.

☒ a. LQG: Greater than 1000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ d. United States Importer of Hazardous Waste

☐ e. Mixed Waste (hazardous and radioactive) Generator

☐ 2. Transporter of Hazardous Waste

☒ 3. Treater, Storer or Disposer of Hazardous Waste (at your site)
 Note: A hazardous waste permit is required for this activity.

☐ 4. Recycler of Hazardous Waste (at your site)

☐ 5. Exempt Boiler and/or Industrial Furnace

☐ a. Small Quantity On-Site Burner Exemption

☐ b. Smelting, Melting, Refining Furnace Exemption

☒ 6. Underground Injection Control

B. Universal Waste Activities

☐ 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Destination Facility for Universal Waste
 Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
 Mark all boxes that apply.

☐ 1. Used Oil Transporter
 If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

☐ 2. Used Oil Processor and/or Re-refiner
 If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner

☐ 4. Used Oil Fuel Marketer
 If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID No. LAD008213191

OMB#: 2050-0024 Expires 10/31/2007

11. Description of Hazardous Wastes (see Instructions on page 17)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D018	D019	D021
D022	D023	D024	D025	D026	D027	D028

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if needed for more waste codes.

12. Comments (see Instructions on page 17)

Sec 9 - Date became operator was the date that Rubicon's name was changed to Rubicon LLC
 Sec 11, Box A Continued - All possible EPA waste codes listed
 Section 11, Box A, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, F027, F039, K025, K027, K083, K103, K104, K111, K112, K113, K114, K115, K116, LABP, P008, P012, P022, P024, P028, P047, P048, P077, P095, P096, P105, P106, P120, U002, U003, U006, U008, U009, U012, U017, U019, U021, U030, U031, U037, U044, U047, U048, U052, U055, U056, U057, U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U083, U088, U095, U096, U101, U102, U105, U106, U108, U109, U112, U115, U117, U120, U121, U122, U123, U127, U128, U130, U131, U133, U140, U144, U147, U151, U154, U159, U161, U165, U169, U170, U171, U181, U188, U190, U191, U196, U197, U209, U210, U211, U213, U218, U220, U221, U223, U225, U226, U227, U228, U235, U239, U240, U328, U353, U359, U404.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (see Instructions on page 17)

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>C. Eric Phillips</i>	C. Eric Phillips, V.P. & Gen Mgr	08/07/2007

OMB# 2050-0034 Expires 10/31/2002

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: Michelle	MI: B.	Last Name: Eaglin
	Phone Number: (225) 673-6141		Phone Number Extension: 5590
2. Facility Permit Contract Mailing Address (See instructions on page 35)	Street or P.O. Box: P. O. Box 517		
	City, Town or Village: Geismar		
	State: Louisiana		
	County: Ascension Parish		Zip Code: 70734
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: P.O. Box 517		
	City, Town or Village: Geismar		
	State: Louisiana		
	County: Ascension Parish	Zip Code: 70734	Phone Number: (225) 673-6141
4. Operator Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: P.O. Box 517		
	City, Town or Village: Geismar		
	State: Louisiana		
	County: Ascension Parish	Zip Code: 70734	Phone Number: (225) 673-6141
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 10/15/63 Articles of Incorporation Signed 10/2/1979 (Submission of HW-1 Form)		

6. Other Environmental Permits (See instructions on page 36)

A. Permit Type (Enter Code)	B. Permit Number	C. Description
R	LAD 008213191	RCRA Hazardous Waste effective 1/17/94
R	LAD 008213191-PC-01	Post-Closure Permit for North/South Ponds effective 1/23/98
N	LA 0000892	LPDES Water Permit effective 9/1/02
U	Conservation Order No. 2000-09-WD	Louisiana Department of Natural Resources Conservation Order for Class 1 Hazardous Disposal Wells effective 8/16/00 for four wells
U	EPA Injection Well No Migration Exemption Reissuance	For Four Injection Wells Effective Date 7/27/99
U	Land Disposal Restrictions Exemption/No Alternatives	LDEQ Effective Date 9/21/94
U	Conservation Order No. 2001-02-WD	Louisiana Department of Natural Resources Conservation Order to Construct a Class 1 Hazardous Disposal Well No. 5 effective 10/8/01
Continued Attachment 1	Continued Attachment 1	Continued Attachment 1

7. Nature of Business (Provide a brief description; see instructions on page 37)

Rubicon is a chemical manufacturer of nitrobenzene (NB), aniline, diaminodiphenyl methane (DAOPM), and pure and polymeric methylenediphenyl diisocyanate (MDI), phosgene, diphenylamine (DPA), and polyols. Also adsorption and stripping of hydrogen chloride to produce hydrochloric acid. A Maleic Anhydride Plant is currently under construction and is expected to be operational in fourth quarter or first quarter of 2009.

Rubicon discharges the wastewater from the Praxair Plant that is located adjacent to Rubicon as part of Rubicon's LPDES Permit.

The DNT Unit and Nitric Acid Unit were shut down in October 1998 and March 1999, respectively. The TDA Process Unit was permanently shut down in August 2003. The TDI Unit was shut down in July 2005.

8. Process Codes and Design Capacities (See Instructions on page 37)

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item 9.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
D80	Landfill	Acres; Hectares; Acres Per Day; or Hectares Per Day	T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Tons Per Hour; Short Tons Per Day; Bin Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	Tons Per Hour; Short Tons Per Day; Bin Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D83	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S03	Waste Pile	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S99	Other Storage	Any Unit of Measure Listed Below	T93	Halogen Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Other Industrial Furnaces Listed in 40 CFR §260.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X01	Miscellaneous (Subpart X)	Any Unit of Measure Listed Below
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Bin Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Day; or Million Btu Per Day	X02	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Bin Per Hour; Gallons Per Day; Liters Per Day; or Million Btu Per Day	X03	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Cubic Yards
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Bin Per Hour; or Million Btu Per Hour	X04	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Bin Per Hour; or Million Btu Per Hour
			X05	Geologic Repository	Cubic Yards; Cubic Meters; Acres; Hectares; or Million Btu Per Hour
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	H	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	E	Short Tons Per Day	N	Acres	A
Liters	L	Metric Tons Per Day	S	Acres-foot	F
Liters Per Hour	U	Pounds Per Hour	J	Hectares	H
Liters Per Day	V	Kilograms Per Hour	R	Hectares-meter	Q
		Million Btu Per Hour	X	Bin Per Hour	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units			For Official Use Only				
					(1) Amount (Specify)										
X	1	S	0	2											
	1	S	0	1	Container Storage	35,750	(Diminsions 47 ft by 97 ft)	G	0	0	1				
	2	S	0	2	MS-431	15,200	-	G	0	0	1				
	3	S	0	2	MS-438	2,630	-	G	0	0	1				
	4	S	0	2	MS-603	1,100	-	G	0	0	1				
	5	S	0	2	MS-2303	1,100	-	G	0	0	1				
	6	S	0	2	MS-2207	26,038	-	G	0	0	1				
	7	S	0	2	MS-2230	3,200	-	G	0	0	1				
	8	T	0	1	MF-8603*	199,920	-	G	0	0	1				
	9	T	0	1	MF-8616*	199,920	-	G	0	0	1				
1	0	T	0	1	MF-8638 A*	1,006,983	-	G	0	0	1				
1	1	T	0	1	MF-8638 B*	1,006,983	-	G	0	0	1				
					See Attachment 2 for more										

NOTE: IF you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item 9.

9. Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units			D. Description of Process
					(1) Amount (Specify)						
	1	T	0	4							
	1									In-situ Vitrification	
	2										
	3										
	4										

10. Description of Hazardous Wastes (See instructions on page 37)

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261, Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
METRIC UNIT OF MEASURE	CODE
POUNDS	P
KILOGRAMS	K
TONS	T
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter '000' in the extreme right box of Item 10.D(1)
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2)

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous waste that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on the line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
							(1) PROCESS CODES (Enter code)									
X-1	1	K	0	5	4	900	P	T	0	3	D	8	0			
		D	0	0	2	400	P	T	0	3	D	8	0			
X-3	3	D	0	0	1	100	P	T	0	3	D	8	0			
X-4	4	D	0	0	2											
																Included With Above

OMB# 2050-0034 Expires 10/31/2002

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)					B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))						
00 1	K	0	8	3	9,111	T	S	0	1								
00 2	D	0	1	8			S	0	2	T	8	0					Included with above
00 3	D	0	3	6													Included with above
00 4	D	0	0	1													Included with above
00 5	U	0	1	2													Included with above
00 6	U	1	6	9													Included with above
00 7	U	0	1	9													Included with above
00 8	All or part of these codes																Included with above
00 9	U	0	1	2	199,104	T	S	0	1								Included with above
01 0	U	1	6	9			T	0	1	S	0	2	D	7	9		Included with above
01 1	K	0	8	3													Included with above
01 2	U	0	1	9													Included with above
01 3	D	0	3	6													Included with above
01 4	K	1	0	4													Included with above
01 5	D	0	1	8													Included with above
01 6	D	0	0	7													Included with above
01 7	D	0	0	1													Included with above
01 8	D	0	0	2													Included with above
01 9	All or part of these codes																Included with above
01 0	K	1	0	4	750,863	T	T	0	1	S	0	2	D	7	9		Included with above
02 1	D	0	0	2			S	0	1								Included with above
02 2	D	0	1	8													Included with above
02 3	D	0	3	6													Included with above
02 4	All or part of these codes																Included with above
02 5	D	0	3	6	43,314	T	T	0	1	S	0	2	D	7	9		Included with above
02 6	D	0	1	8			S	0	1								Included with above
02 7	D	0	0	2													Included with above
02 8	All or part of these codes																Included with above
02 9	D	0	2	1	62	T	S	0	1								Included with above
03 0	D	0	1	9													Included with above
03 1	D	0	2	2													Included with above
03 2	D	0	3	9													Included with above
03 3	D	0	0	1													Included with above
03 4	F	0	0	2													Included with above
03 5	D	0	0	2													Included with above
03 6	All or part of these codes																Included with above
03 7	U	0	1	2	30	T	S	0	1								Included with above
03 8	D	0	0	2													Included with above
03 9	All or part of these codes																Included with above

Continued on Attachment 3

OMB# 2050-0034 Expires 10/31/2002

11. Map (See instructions on page 38)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluid underground. Include all springs, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 39)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 39)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 39)

11. See Figure 1 in Appendix B, Section 4 in 8/07 Addendum to the 8/03 Hazardous Waste (HW) Permit Renewal Application (8/07Addendum) and Figure 7B in Appendix D, Section 3 in May 2008 Response to Second Notice of Deficiencies (NODs)

12. See Appendix B, Section 5 in this 8/07 Addendum

13. See Appendix B, Section 6 in this 8/07Addendum

Attachment 1

A. Permit Type (Enter Code)	B. Permit Number	C. Description
U	EPA Injection Well No Migration Exemption Reissuance for Well No. 5	Approval for Well No. 5 Effective Date 11/12/03
U	DNR Approval to Operate Well No. 5	Approval for Well No. 5 Effective Date 12/11/03
U	LDEQ "No Alternatives" Determination Reissuance	For Five Injection Wells Effective Date 5/3/04
E	2261-V2	Aniline 2 Part 70 Operating Air Permit effective 9/26/05
E	2391-V8	MDI Plant Part 70 Operating Air Permit effective 1/18/2007
E	2278-V0	Reductions Plant Part 70 Operating Air Permit effective 10/28/02
E	2420-V1	Offsite Area Part 70 Operating Air Permit Issued December 21, 2007.
E	2010-V0	Polyols Plant Part 70 Operating Air Permit issued 12/18/04
E	3037-V0	Maleic Anhydride Plant Part 70 Operating Permit issued 3/21/07
E	Authorization Number OC-0358	Order to Close Solid Waste Impoundment (11/8/07)
Applications Submitted to LDEQ		
E	Solid Waste Permit Application for NPDES Pond	Submitted 12/93 and updated 5/94
E	Class 3 Permit Modification for BIF Units (LAD 008213919)	Submitted 10/94
E	Hazardous Waste Permit Renewal Application (LAD008213191)	Submitted 8/03
E	Reductions Plant Part 70 Operating Renewal Permit Application (2278-V0)	Submitted 4/07
E	Post Closure Renewal Application LAD 008213191 PC-01	Submitted 7/07
E	Minor Air Permit Modification for Aniline Complex (2261-V2)	Submitted 3/08
E	LPDES Renewal Application (LA 0000892)	Submitted 2/07
E	Minor Modification to the Maleic Anhydride Air Permit (3037-V0)	Submitted 12/07
E	Minor Modification to the MDI Complex Air Permit (2391-V8)	Submitted 6/08
Applications Submitted to EPA		
E	EPA Injection Well No Migration Exemption Reissuance	Submitted 1/05

ATTACHMENT 2

Process Codes and Design Capacities (Continued)						
Line Number	A. Process Code (From list above)	B. Process Design Capacity				For Official Use Only
		(1) Amount	(Specify)	(2) Units of Measure (Enter code)	C. Process Total Number of Units	
12	T01	MF-8638 C* 1,006,983		G	001	
		* pH adjustment from optimum injectivity and dissolution of salts				
13	S02	MF-8275	199,406	G	001	
14	S02	MS-8632	32,200	G	001	
15	S02	MS-8648	280	G	001	
16	T80	DPA 1 Superheater	27	X	001	
17	T80	DPA 2 Superheater	18	X	001	
18	T80	Aniline 2 BIF Unit	30	X	001	
19	T01	GF-8189A [⊕]	1.31E+06	U	001	
20	T01	GF-8189B [⊕]	1.31E+06	U	001	
21	T01	GF-8189C [⊕]	1.31E+06	U	001	
22	T01	GF-8189D [⊕]	1.31E+06	U	001	
23	T01	GF-8189E [⊕]	1.31E+06	U	001	
		[⊕] Based on permitted monthly injection volume per injection interval in Conservation Order 2000-09 WD. Total monthly permitted volume divided by 30 days and divided by 5 sand filters.				
24	D79	Deepwell No. 1	⊕	U	001	
25	D79	Deepwell No. 3	⊕	U	001	
26	D79	Deepwell No. 4	⊕	U	001	
27	D79	Deepwell No. 5	⊕	U	001	

⊕ Conservation Orders 2000-09-WD and 2001-02-WD

Injection Intervals Name	Disposal Wells	Monthly Injection Volume Per Injection Interval (gallons/month)	Monthly Injection Volume Per Injection Interval (gallons/day) (Based on 30 days)
Upper "B" Sand	1	32,400,000	1,080,000
Lower "B" Sand	1	38,880,000	1,296,000
"D" Sand	1, 3, 4 & 5	43,200,000	1,440,000
"4,800 FT" Sand	1, 3, 4 & 5	82,080,000	2,736,000

ATTACHMENT 3

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)			B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))	
						(1) PROCESS CODES (Enter code)											
04 0	U	0	1	2	316,795	T	S	0	1								
04 1	F	0	0	2			T	0	1	S	0	1	D	7	9		Included with above
04 2	U	0	3	7													Included with above
04 3	U	1	2	2													Included with above
04 4	D	0	2	1													Included with above
04 5	D	0	3	9													Included with above
04 6	D	0	1	9													Included with above
04 7	D	0	2	2													Included with above
04 8	D	0	0	7													Included with above
04 9	D	0	0	1													Included with above
05 0	P	0	9	5													Included with above
05 1	D	0	0	2													Included with above
05 2	All or part of these codes																Included with above
05 3	D	0	0	2	36,863	T	T	0	1	S	0	1	D	7	9		
05 4	D	0	2	1			S	0	1								Included with above
05 5	D	0	1	9													Included with above
05 6	All or part of these codes																Included with above
05 7	D	0	0	2	371,362	T	T	0	1	S	0	1	D	7	9		
05 8	D	0	2	3			S	0	1								Included with above
05 9	All or part of these codes																Included with above
06 0	D	0	3	6	2,711	T	T	0	1	S	0	1	D	7	9		
06 1	D	0	2	1			S	0	1								Included with above
06 2	D	0	1	8													Included with above
06 3	D	0	0	1													Included with above
06 4	All or part of these codes																Included with above
06 5	D	0	0	2	1,001,259	T	T	0	1	S	0	1	D	7	9		
06 6	D	0	2	1			S	0	1								Included with above
06 7	D	0	2	2													Included with above
06 8	D	0	1	9													Included with above
06 9	D	0	3	9													Included with above
07 0	All or part of these codes																Included with above
07 1	K	1	1	2	23,616	T	S	0	1								
07 2	K	1	1	4			T	0	1	S	0	1	D	7	9		
07 3	K	0	8	3													Included with above
07 4	K	1	1	5													Included with above
07 5	U	1	6	9													Included with above
07 6	U	2	2	1													Included with above
07 7	U	0	1	2													Included with above
07 8	U	1	0	5													Included with above
07 9	U	1	0	6													Included with above
08 0	Continued on Next Page																Included with above

Page 10 of 15

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)					B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
								(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))	
12	4	D	0	2	7													Included with above	
12	5	D	0	3	6													Included with above	
12	6	D	0	1	9													Included with above	
12	7	D	0	4	0													Included with above	
12	8	D	0	0	1													Included with above	
12	9	D	0	0	7													Included with above	
13	0	D	0	3	8													Included with above	
13	1	D	0	1	1													Included with above	
13	2	D	0	0	5													Included with above	
13	3	D	0	0	2													Included with above	
13	4	D	0	0	4													Included with above	
13	5	All or part of these codes																	
13	6	L	A	B	P	37	T		S	0	1								
13	7	P	0	1	2													Included with above	
13	8	U	1	5	1													Included with above	
13	9	D	0	0	9													Included with above	
14	0	All or part of these codes																Included with above	
14	1	D	0	0	2	1	T		S	0	1								
14	2	D	0	3	6													Included with above	
14	3	D	0	0	1													Included with above	
14	4	D	0	0	9													Included with above	
14	5	All or part of these codes																Included with above	
14	6	F	0	0	2	6,575	T		T	0	1	S	0	1	D	7	9		
14	7	F	0	0	3													Included with above	
14	8	F	0	0	5													Included with above	
14	9	D	0	0	2													Included with above	
15	0	D	0	2	1													Included with above	
15	1	D	0	3	6													Included with above	
15	2	D	0	4	0													Included with above	
15	3	D	0	3	0													Included with above	
15	4	D	0	3	5													Included with above	
15	5	D	0	0	5													Included with above	
15	6	D	0	2	7													Included with above	
15	7	P	0	2	2													Included with above	
15	8	D	0	3	8													Included with above	
15	9	D	0	1	1													Included with above	
16	0	D	0	0	7													Included with above	
16	1	D	0	1	9													Included with above	
16	2	D	0	2	2													Included with above	
16	3	All or part of these codes																Included with above	

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)						B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter code)												(2) PROCESS DESCRIPTION (If a code is not entered in D(1))							
	S	0	1																	
16	4	U	0	6	9	14	T	S	0	1										
16	5	U	1	4	7			T	0	1	S	0	1	D	7	9	Included with above			
16	6	D	0	0	1												Included with above			
16	7	F	0	0	3												Included with above			
16	8	F	0	0	5												Included with above			
16	9	D	0	3	8												Included with above			
17	0	D	0	0	2												Included with above			
17	1	D	0	0	7												Included with above			
17	2	D	0	0	8												Included with above			
17	3	U	1	6	1												Included with above			
17	4	U	2	1	3												Included with above			
17	5	U	0	0	3												Included with above			
17	6	U	0	0	8												Included with above			
17	7	U	1	9	0												Included with above			
17	8	U	2	1	0												Included with above			
17	9	U	1	8	8												Included with above			
18	0	U	1	9	6												Included with above			
18	1	U	0	5	6												Included with above			
2	All or part of these codes																Included with above			
18	3	D	0	0	2	2,192		T	0	1	S	0	1	D	7	9				
18	4	D	0	1	8			S	0	1							Included with above			
18	5	All or part of these codes																		
18	6	D	0	2	7	12,362	T	S	0	1										
18	7	D	0	2	1												Included with above			
18	8	K	1	0	4												Included with above			
18	9	F	0	0	2												Included with above			
19	0	U	0	3	7												Included with above			
19	1	U	1	6	9												Included with above			
19	2	U	0	1	2												Included with above			
19	3	U	1	2	2												Included with above			
19	4	U	2	2	1												Included with above			
19	5	U	0	1	9												Included with above			
19	6	D	0	0	7												Included with above			
19	7	D	0	0	8												Included with above			
19	8	D	0	3	0												Included with above			
19	9	K	0	8	3												Included with above			
20	0	U	2	2	3												Included with above			
20	1	F	0	0	3												Included with above			
20	2	F	0	0	5												Included with above			
20	3	D	0	0	1												Included with above			
20	4	D	0	2	2												Included with above			
20	5	Continued on Next Page																		

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))			
20	6	D 0 1 9												Included with above	
20	7	D 0 3 9												Included with above	
20	8	D 0 3 6												Included with above	
20	9	D 0 1 8												Included with above	
21	0	U 0 6 9												Included with above	
21	1	U 1 4 7												Included with above	
21	2	D 0 0 2												Included with above	
21	3	K 1 1 2												Included with above	
21	4	U 0 7 0												Included with above	
21	5	U 1 0 5												Included with above	
21	6	U 1 0 6												Included with above	
21	7	U 0 8 0												Included with above	
21	8	K 1 1 4												Included with above	
21	9	K 1 1 5												Included with above	
22	0	All or part of the above												Included with above	
22	1	D 0 1 8	2,214	T	S	0	1								
22	2	D 0 3 0			T	0	1	S	0	2	D	7	9	Included with above	
22	3	D 0 3 9												Included with above	
22	4	D 0 3 6												Included with above	
22	5	D 0 2 1												Included with above	
22	6	D 0 1 9												Included with above	
22	7	D 0 2 7												Included with above	
22	8	D 0 2 2												Included with above	
22	9	All or part of the above												Included with above	
23	0	F 0 0 3	14	T	S	0	1								
23	1	F 0 0 5												Included with above	
23	2	D 0 0 1												Included with above	
23	3	D 0 3 5												Included with above	
23	4	D 0 0 5												Included with above	
23	5	D 0 1 8												Included with above	
23	6	All or part of these codes												Included with above	
23	7	D 0 2 7	7,785	T	S	0	1								
23	8	F 0 0 2												Included with above	
23	9	U 2 2 3												Included with above	
24	0	U 2 2 1												Included with above	
24	1	U 0 7 0												Included with above	
24	2	D 0 1 9												Included with above	
24	3	D 0 3 9												Included with above	
24	4	D 0 2 2												Included with above	
24	5	U 0 3 7												Included with above	
24	6	Continued on Next Page												Included with above	

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter code)												(2) PROCESS DESCRIPTION (If a code is not entered in D(1))					
24	7	U	1	2	2											Included with above		
24	8	D	0	2	1											Included with above		
24	9	U	0	1	2											Included with above		
25	0	K	1	1	2											Included with above		
25	1	D	0	3	0											Included with above		
25	2	D	0	1	8											Included with above		
25	3	D	0	3	6											Included with above		
25	4	K	1	1	4											Included with above		
25	5	K	1	1	5											Included with above		
25	6	U	1	6	9											Included with above		
25	7	K	0	8	3											Included with above		
25	8	K	1	0	4											Included with above		
25	9	U	0	1	9											Included with above		
26	0	D	0	0	5											Included with above		
26	1	D	0	0	8											Included with above		
26	2	D	0	0	7											Included with above		
26	3	D	0	0	6											Included with above		
26	4	D	0	1	1											Included with above		
26	5	D	0	0	9											Included with above		
26	6	D	0	0	1											Included with above		
26	7	F	0	0	1											Included with above		
26	8	F	0	0	3											Included with above		
26	9	U	1	0	5											Included with above		
27	0	U	1	0	6											Included with above		
27	1	U	1	1	5											Included with above		
27	2	D	0	4	0											Included with above		
27	3	D	0	3	5											Included with above		
27	4	F	0	0	5											Included with above		
27	5	U	0	8	3											Included with above		
27	6	U	0	6	9											Included with above		
27	7	U	1	4	7											Included with above		
27	8	D	0	0	2											Included with above		
27	9	D	0	0	3											Included with above		
28	0	U	0	8	0											Included with above		
28	1	P	0	9	5											Included with above		
28	2	P	0	9	6											Included with above		
28	3	All or part of the above														Included with above		
28	4	D	0	1	8		5											
28	5	D	0	3	5											Included with above		
28	6	D	0	4	0											Included with above		
28	7	D	0	3	9											Included with above		
28	8	D	0	0	6											Included with above		
28	9	Continued on Next Page														Included with above		

EPA Form 8700-23 (Revised 5/2002)

TABLE OF CONTENTS

TABLE OF CONTENTS

I.	PERMIT PREAMBLE	1
II.	GENERAL PERMIT CONDITIONS	4
	II.A. DURATION OF PERMIT	4
	II.B. EFFECT OF PERMIT	4
	II.C. PERMIT ACTIONS	4
	II.D. SEVERABILITY	5
	II.E. DUTIES AND REQUIREMENTS	5
III.	GENERAL PERMIT CONDITIONS	17
	III.A. DESIGN AND OPERATION OF ALL FACILITIES	17
	III.B. REQUIRED NOTICE	17
	III.C. GENERAL WASTE ANALYSIS	17
	III.D. SECURITY	18
	III.E. GENERAL INSPECTION REQUIREMENTS	18
	III.F. PERSONNEL TRAINING	18
	III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE	19
	III.H. LOCATION STANDARDS	19
	III.I. PRECIPITATION RUN-ON AND RUN-OFF	19
	III.J. HURRICANE EVENTS	19
	III.K. PREPAREDNESS AND PREVENTION	19
	III.L. CONTINGENCY PLAN	20
	III.M. MANIFEST SYSTEM	21
	III.N. RECORDKEEPING AND REPORTING	21
	III.O. CLOSURE	21
	III.P. POST-CLOSURE	27
	III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE	27
	III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS	28
	III.S. LIABILITY REQUIREMENTS	28
	III.T. INCAPACITY OF THE PERMITTEE	28
	III.U. POST-CLOSURE NOTICES	29
IV.	PERMITTED CLOSED UNITS	29
V.	PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES	35
VI.	GROUND WATER PROTECTION	73

TABLE OF CONTENTS (CONT'D)

***VII. 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA**

***VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS – CORRECTIVE ACTION STRATEGY (CAS)**

- * These conditions will be included with the Rubicon, LLC-Geismar Facility's Post-Closure Renewal Permit (LAD008213191-PC-RN-1) to be issued at a later date.**

LIST OF ATTACHMENTS

ATTACHMENT 1

LIST OF FACILITY DOCUMENTS INCORPORATED IN THE PERMIT BY REFERENCE

BODY OF PERMIT

**DRAFT
HAZARDOUS WASTE OPERATING RENEWAL PERMIT**

**Rubicon, LLC
EPA ID# LAD 008 213 191
Agency Interest# 1468**

**Ascension Parish
Geismar, Louisiana
PER20030014
Permit Number LAD 008213191-OP-RN-1**

I. PERMIT PREAMBLE

This Permit is issued to Rubicon, LLC, hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the Permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This Permit is based on information submitted in the Permit Application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This Permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

“Administrative Authority” means the Secretary of the Department of Environmental Quality or his designee or the appropriate assistant secretary or his designee.

“Application” refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

“CWA” means Clean Water Act.

“Corrective Action” is an activity conducted to protect human health and the environment.

“Department” means the Louisiana Department of Environmental Quality (LDEQ)

“EPA” means the United States Environmental Protection Agency.

“HSWA” means the 1984 Hazardous and Solid Waste Amendments to RCRA.

“Hazardous Constituent” means any constituent identified in LAC 33:V.Chapter 31. Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

“LDEQ” means the Louisiana Department of Environmental Quality.

“Operating Record” means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.B.

“Permittee” means Rubicon, LLC, Post Office Box 517, Geismar, Louisiana 70734.

“RCRA Permit” means the full Permit, with RCRA and HSWA portions.

“SARA” means Superfund Amendments and Reauthorization Action of 1986.

“Stabilization” is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

All regulating citations are defined as being the regulations in effect on the date of issuance of this Permit. New and/or amended regulations are not included as Permit requirements until Permit modification procedures as specified in Condition II.C. of the Permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This Permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This Permit authorizes the Permittee to store and treat hazardous waste in accordance with the conditions of this Permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this Permit. Compliance with this Permit and the LAC 33:V.Subpart 1, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this Permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the Permit application may be cause for revocation or modification of this Permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the Permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the Permit when the standards or regulations on which the Permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the Permit was issued.

The filing of a request for Permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any Permit condition.

II.D. SEVERABILITY

The conditions of this Permit are severable and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance may be authorized by an emergency Permit. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include Permit termination, Permit revocation and reissuance, Permit modification, or denial of Permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee must reapply for the Permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the Permit expires.

II.E.3. Permit Extension

This Permit and all conditions herein will remain in effect beyond the Permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new Permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this Permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the Permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this Permit.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this Permit;
- II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this Permit;
- II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this Permit; and
- II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment 1.

II.E.9.b. Records of monitoring information shall include:

- II.E.9.b.(1) the date, exact place, and time of sampling or measurements;
- II.E.9.b.(2) the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;
- II.E.9.b.(3) the date(s) analyses were performed;

II.E.9.b.(4) the name(s) and signature(s) of the individual(s) who performed the analyses;

II.E.9.b.(5) the analytical techniques or methods used;

II.E.9.b.(6) the results of such analyses; and

II.E.9.b.(7) associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1) any commercial laboratory providing analytical results and test data to the Department required by this Permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I. Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a Permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or

- otherwise required by the Department regulations.

This includes, but is not limited to data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c.(2) If the Permittee decides to use their own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document quality assurance/quality control procedures.

II.E.9.c.(3) For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the Permit, maintain records of all data used to complete the application for this Permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the Permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the Permittee may not manage hazardous waste in the modified portion of the unit until the unit is complete and:

II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the Permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the Permit and all applicable Conditions of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the Permitted facility or activity that may result in noncompliance with Permit requirements.

II.E.14. Transfer of Permits

This Permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the Permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:I.3901, et seq. ("Notification Regulation and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended.) This report shall include the following:

II.E.16.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.16.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.16.b.(1) name, address, and telephone number of the owner or operator;

II.E.16.b.(2) name, address, and telephone number of the facility;

II.E.16.b.(3) date, time, and type of incident;

II.E.16.b.(4) name and quantity of materials involved;

II.E.16.b.(5) the extent of injuries, if any;

II.E.16.b.(6) an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.16.b.(7) estimated quantity and disposition of recovered material that resulted from the incident.

II.E.17. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I.3901, "Notification Regulations and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended, the report shall be submitted in accordance with those regulations. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.18. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.16 above.

II.E.19. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit application, or that it submitted incorrect information in a Permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

II.E.20. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.21. Schedule of Compliance

II.E.21.a. Within sixty (60) days of the effective date of this Permit, the Permittee shall submit for review and approval by the Administrative Authority, a plan for installing impermeable coatings for each Permitted tank system with secondary containment including an external liner, as designated in Table 7 of this Permit. The plan must contain the following items:

II.E.21a.(1) The engineering specifications for the impermeable coatings that will be utilized including compatibility with the waste being stored;

II.E.21.a.(2) A proposed schedule for completing the installation of the impermeable coatings.

II.E.21.b. Within sixty (60) days of the effective date of this Permit, the Permittee shall submit for review and approval by the Administrative Authority, a schedule for the initiation and completion of the proposed changes to the secondary containment areas of Tank MS-431, Tank MS-603, and Tank MS-2207.

II.E.21.c. Within thirty (30) days of installing the impermeable coatings discussed in Permit Condition II.E.21.a, the Permittee shall submit an installation inspection report of the impermeable coatings certified by an independent, qualified, Louisiana registered professional engineer.

II.E.21.d. Within thirty (30) days of completing the construction of the proposed changes to the secondary containment areas discussed in Condition II.E.21.b, the Permittee shall submit an installation inspection report for the secondary containment

areas, certified by an independent, qualified, Louisiana registered professional engineer.

- II.E.21.e.** Within thirty (30) days of the effective date of this Permit, the Permittee shall submit updated Financial Assurance information in accordance with LAC 33:V.Chapter 37.

II.E.22. Additional Operating Standards

(RESERVED)

II.E.23. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.24. Documents To Be Maintained at Facility Site

- II.E.24.a.** The Permittee shall maintain at the facility, until closure is completed and certified by an independent Louisiana registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.24.a.(1) Waste Analysis Plan submitted in accordance with LAC 33:V.1519 (see Attachment 1).

II.E.24.a.(2) Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.24.a.(3) Contingency Plan prepared in accordance with LAC 33:V.1513 (see Attachment 1).

II.E.24.a.(4) Arrangements with local authorities in accordance with LAC 33:V.1511.G. (see Attachment 1).

II.E.24.a.(5) Closure Plan submitted in accordance with LAC 33:V.3511 and any post-closure care requirements that may be required initially or through Permit

modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.24.a.(6) Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and any post-closure cost estimate that may be required initially or through Permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.24.a.(7) Operating records as required by LAC 33:V.1529, 1911.D, 2115.D, and 3005.H.

II.E.24.a.(8) Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

II.E.24.a.(9) Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.24.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this Permit shall be submitted to the Administrative Authority for approval and in accordance with LAC 33:V.321.

II.E.25. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.26. Manifest

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9.

II.E.27. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.28. Waste Discharges

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.29. Non-Listed Hazardous Waste Facilities

This Permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that a non-permitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.18 of the General Permit Conditions.

II.E.30. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all applicable regulations promulgated thereunder.

II.E.31. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.32. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary Permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII to be outlined in the Permittee's Final Post-Closure Renewal Permit for the North and South Ponds issued at a later date.

II.E.33. Attachments and Documents Incorporated by Reference

All attachments and documents required by this Permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this Permit by reference and become an enforceable part of this Permit. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or

insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the Permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this Permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this Permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL UNITS

- III.A.1.** The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.
- III.A.2.** The Permittee shall not receive for treatment, storage, or disposal any hazardous waste generated outside the United States or its territories, in accordance with LA. R.S. 30:2189 of the Louisiana Environmental Quality Act.
- III.A.3.** No off-site generated hazardous wastes may be shipped to the Geismar facility (LAD 008213191) for storage, treatment, and/or disposal.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment 1 and in accordance with LAC 33:V.1519.

- III.C.1.** The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.
- III.C.2.** If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all hazardous waste streams generated by the Permittee on-site and treated, stored, or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report.
- III.C.3.** In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all the sampling and QA/QC procedures of Condition II.E.9.c. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507 and the Permittee's Security Plan, as referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the Inspection Plan referenced in Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509.A and B, 1911, 2109, and 3005.F.

III.F. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the outline referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion or treatment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b, 2111.B.4, B.5, and B.6.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F and 2109.B.

III.K.5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met (Attachment 1). This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN**III.L.1. Implementation of Plan**

The Permittee must immediately carry out the provisions of the Contingency Plan (Attachment 1), and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Plan

The Permittee shall compile and keep current an operations plan covering all aspects of the Permittee's treatment and storage facilities as required by LAC 33:V.517.T.7.

III.O. CLOSURE/POST-CLOSURE

CLOSURE

The closure plan shall include the following responses by the Permittee to LAC 33:V.1915, 2117, 3005.I., 3503, 3505, 3507, 3509, 3511, 3513, and 3515.

III.O.1. Closure Performance Standard. The Permittee shall close the facility in accordance with the closure plan referenced in Attachment 1 and in accordance with the applicable Conditions of LAC 33:V.3507.

- III.O.2. Amendment to Closure Plan.** The Permittee shall amend the closure plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable.
- III.O.3. Notification of Closure.** The Permittee shall notify the Administrative Authority at least 45 days prior to the date he expects to begin closure in accordance with LAC 33:V.3511.D.
- III.O.4. Time Allowed For Closure.** After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.
- III.O.5. Disposal or Decontamination of Equipment.** The Permittee shall decontaminate and dispose all facility equipment in accordance with the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.
- III.O.6. Certification of Closure.** The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by LAC 33:V.3517.
- III.O.7. Inventory at Closure.** The Permittee shall be responsible for closure costs based upon the maximum Permitted facility inventories listed below in Tables 1, 2, and 3.

TABLE 1
(19) Existing Hazardous Waste Tanks

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
MS-431	Aniline Wastes	K083, D018, D036, U012, U169	15,200
MS-438	Aniline Wastes	K083, D018, D036, U012, U169	2,630
MS-603	Aniline Wastes	K083, D018, D036, U012, U169	1,100
MS-2303	Aniline Wastes	K083, D018, D036, D023, U012, U169	1,100

MS-2207	Dry Purge/Reactor Residue, Aniline and Nitrobenzene Wastes	K083, D018, D036, U019, U012, U169	26,038
MS-2230	Wet Purge/Reactor Residue, Aniline and Nitrobenzene Wastes	K083, D018, D036, D023, U012, U169, D001	3,200
D-8603*	Waste Effluent Nitrate Equalization Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,920
MF-8616*	Waste Effluent Nitrate Equalization Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,920
MF-8638A*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	1,006,983
MF-8638B*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069,	1,006,983

		F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	
MF-8638C*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	1,006,983
MF8-8275	Waste Effluent Surge Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,406
MF-8632	Waste Effluent Backwash Hold Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039,	32,200

		D036, D035, D011	
MF-8648	Waste Effluent Vent System Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	280

* pH adjustment from optimum injectivity and dissolution of salts

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS PER DAY)
GF-8189A ¹	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189B ¹	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume

GF-8189C ^L	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189D ^L	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189E ^L	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume

^L Based on Permitted monthly injection volume per injection interval in Conservation Order 2000-09 WD. Total monthly Permitted volume divided by thirty (30) days and divided by five (5) sand filters.

TABLE 2
Existing Container Storage Area

CONTAINER STORAGE	LOCATION	TOTAL AREA LIMITS (SQ. FT)	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
Permitted Container Storage Area	UIC Pretreatment Area	47.0 x 97.0	Reference Section 10 in the Part A Application of this Permit for the waste codes	35,750

TABLE 3
(3) Existing Combustion Units

Combustion Unit	Service	Location	Maximum Capacity
Aniline 2 BIF Unit	Liquid Hazardous Waste	Aniline Complex Area	30,000,000 BTU/hr
DPA 1 Superheater	Liquid Hazardous Waste	Reductions Area	27,000,000 BTU/hr
DPA 2 Superheater	Liquid Hazardous Waste	Reductions Area	18,000,000 BTU/hr

III.P. POST-CLOSURE

The Permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

- III.Q.1.** The Permittee must maintain cost estimates for closure of facilities in accordance with LAC 33:V.3705 and 3707.
- III.Q.2.** The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:3705.B, 3705.C, and for other circumstances that increase the cost of closure.
- III.Q.3.** The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the administrative authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive. The closure cost estimate shall be based on the maximum Permitted inventory of each facility as specified in Condition III. Tables 1, 2, and 3 of this Permit.

III.Q.5. If the Permittee is unable to complete closure of all facilities specified in Condition III. Tables 1, 2, and 3 of this Permit as per LAC 33:V. Chapter 35 and as acceptable by the Administrative Authority, a Post-Closure Plan must be submitted for each facility failing to achieve clean closure within ninety (90) days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Condition III.O.7.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

III.U. POST-CLOSURE NOTICES

(RESERVED)

IV. PERMITTED FACILITIES**IV.A. TANKS**

Details of the existing tanks listed in Table 4, including design and operational specifications, are contained in Permit Condition V.A.

TABLE 4
(19) Existing Hazardous Waste Tanks

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
MS-431	Aniline Wastes	K083, D018, D036, U012, U169	15,200
MS-438	Aniline Wastes	K083, D018, D036, U012, U169	2,630
MS-603	Aniline Wastes	K083, D018, D036, U012, U169	1,100
MS-2303	Aniline Wastes	K083, D018, D036, D023, U012, U169	1,100
MS-2207	Dry Purge/Reactor Residue, Aniline and Nitrobenzene Wastes	K083, D018, D036, U019, U012, U169	26,038
MS-2230	Wet Purge/Reactor Residue, Aniline and Nitrobenzene Wastes	K083, D018, D036, D023, U012, U169, D001	3,200
MF-8603*	Waste Effluent Nitrate Equalization Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,920

MF-8616*	Waste Effluent Nitrate Equalization Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,920
MF-8638A*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	1,006,983
MF-8638B*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	1,006,983
MF-8638C*	Waste Effluent Settling Storage Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005,	1,006,983

		U105, U106, D002, D022, D019, D039, D036, D035, D011	
MF-8275	Waste Effluent Surge Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	199,406
MF-8632	Waste Effluent Backwash Hold Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	32,200
MF-8648	Waste Effluent Vent System Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	280

* pH adjustment from optimum injectivity and dissolution of salts

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS PER DAY)
GF-8189A ^t	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189B ^t	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189C ^t	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume
GF-8189D ^t	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012,	2,395 liquid volume

		U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	
GF-8189E ¹	Waste Effluent Sand Filter Tank	D027, D018, D021, K104, U147, U069, F002, U037, U169, U012, U122, U221, U019, D007, D008, D030, K083, U223, F003, F005, U105, U106, D002, D022, D019, D039, D036, D035, D011	2,395 liquid volume

¹ Based on Permitted monthly injection volume per injection interval in Conservation Order 2000-09 WD. Total monthly Permitted volume divided by thirty (30) days and divided by five (5) sand filters.

IV.B. CONTAINER STORAGE

Details of design and operational specifications of the existing Permitted container storage area listed below in Table 5, are contained in Condition V.B of this permit.

TABLE 5
Existing Container Storage Area

CONTAINER STORAGE	LOCATION	TOTAL AREA LIMITS (SQ. FT)	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
Permitted Container Storage Area	UIC Pretreatment Area	47.0 x 97.0	Reference Section 10 in the Part A Application of this Permit for the waste codes	35,750

IV.C. COMBUSTION UNITS

Details of the existing tanks listed in Table 6, including design and operational specifications, are contained in Permit Condition V.C.

TABLE 6
(3) Existing Combustion Units

Combustion Unit	Service	Location	Maximum Capacity
Aniline 2 BIF Unit	Liquid Hazardous Waste	Aniline Complex Area	30,000,000 BTU/hr
DPA 1 Superheater	Liquid Hazardous Waste	Reductions Area	27,000,000 BTU/hr
DPA 2 Superheater	Liquid Hazardous Waste	Reductions Area	18,000,000 BTU/hr

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. TANKS

V.A.1. Description of Tank Systems

V.A.1.a. Operation

V.A.1.a.(1) All Permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19, the specification and design criteria submitted in the Part B Permit Application, and the design limits specified in Table 7.

V.A.1.a.(2) The design temperature and pressure for each tank shall not change from the one listed in Table 7, unless a Permit modification is approved by the Department.

V.A.1.b. Permitted Tanks

V.A.1.b.(1). The tank systems listed in Tables 4 and 7 are Permitted to be used for hazardous waste storage or treatment. These tanks have been certified by an independent, professional engineer licensed in the state of Louisiana to have sufficient structural integrity for storage of hazardous waste.

V.A.1.b.(2). All of the tank systems listed in Tables 4 and 7 must be clearly marked with the words "Hazardous Waste".

V.A.1.b.(3). The Permittee is prohibited from storing or treating hazardous waste in any tank storage system not listed in Table 4 for greater than ninety (90) days, unless an extension is granted by the Department, the activity is exempt from regulations, or an Emergency Permit is issued.

V.A.1.b.(4). The Permittee is prohibited from storing any hazardous waste received from offsite in any tank storage system.

V.A.2. Permitted and Prohibited Wastes

V.A.2.a. Permitted Waste

Subject to the terms of this Permit, the Permittee is allowed to store or treat in the tanks described in Condition V.A.1.b of this Permit, the hazardous wastes identified in the most current Part A Permit Application and Condition IV.A, Table 4 of this permit.

V.A.2.b. Prohibited Waste

The Permittee is prohibited from storing hazardous waste that is not identified in Condition V.A.2.a of this Permit.

V.A.3. Secondary Containment**V.A.3.a. Duty to Comply with LAC 33:V.1907.B through F**

The Permittee shall design, construct, operate, and maintain the secondary containment system in accordance with LAC 33:V.1907.B-F, the Part B Permit Application, and Table 7 of this Permit.

V.A.3.b. Prevention of Migration

V.A.3.b.(1). Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system.

V.A.3.b.(2). Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

V.A.3.b.(3). Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system.

V.A.3.b.(4). Spilled or leaked waste must be removed from the secondary containment system within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment, unless it can be demonstrated that removal cannot be accomplished within 24 hours.

V.A.3.b.(5). Accumulated precipitation must be removed from the secondary containment system within 24 hours or in as timely a manner as is possible.

V.A.4. Operating Requirements**V.A.4.a. Duty to Comply with LAC 33:V.1909.A**

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

V.A.4.b. Duty to Comply with LAC 33:V.1909.B

The Permittee shall comply with LAC 33:V.1909.B and Table 7 of this Permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

V.A.4.c. Tank Covers

All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store volatile or malodorous waste.

V.A.4.d. Maintenance

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 7 and not exceed the listed operating conditions.

V.A.5. Ignitable, Reactive, and Incompatible Wastes

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

V.A.6. Inspections**V.A.6.a. Inspection Schedule**

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

V.A.6.b. Daily Inspection

V.A.6.b.(1). At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

V.A.6.b.(1).a. Aboveground portions of the tank system, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

V.A.6.b.(1).b. Data gathered from monitoring and leak detection equipment.

V.A.6.b.(1).c. Construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment (e.g. secondary containment system), to detect erosion, cracks and signs of hazardous waste releases.

V.A.6.b.(2). All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

V.A.6.c. External Inspection

At a minimum, external inspection of each tank covered by this permit shall be performed as often as required by the API designated inspection standard in Table 7. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 7. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.d. Internal Inspection

Internal inspection of each tank covered by this Permit shall be performed as often as required by the inspection standard in Table 7. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Department upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 7. The inspection checklist shall be comparable to that in Appendix C of API Standard 510 or 653, as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e Thickness Testing

V.A.6.e.(1). An authorized inspector shall take tank thickness measurements on tank tops and shells and shall be taken at least on each tank quadrant at least every two (2) years.

Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

V.A.6.e.(2). Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

V.A.6.e.(3). An authorized inspector shall perform tank thickness measurements on tank bottoms as often as the internal inspection required under Condition V.A.6.d, or more often if required by the inspection standard specified in Table 7. The required frequency of inspection with reference to the applicable section of the inspection standard shall be kept on-site and made available to the Administrative Authority upon request.

V.A.6.e.(4). When any tank shell thickness measurement at a single point is less than that required in Table 7, the Permittee shall immediately comply with either Condition V.A.6.e.(4).a or b below. Condition V.A.6.e.(4).b shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

V.A.6.e.(4).a. The tank shall be deemed unfit for use, and the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e.(4).b. An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 7. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.(4).a immediately.

The evaluation must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

V.A.6.f. Overfill Controls

Tank levels shall be continuously monitored and overfill controls shall be visually inspected along with other aboveground portions of the tanks daily. Function of the overfill controls shall be tested annually.

V.A.7 Response to Leaks or Spills**V.A.7.a. Duty to Comply with LAC 33:V.1913.A through E**

In the event of a leak or spill from a tank system, secondary containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

V.A.7.b Leaks and Spills

V.A.7.b.(1). Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

V.A.7.b.(2). Within twenty-four (24) hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that it is not possible to remove the waste within twenty-four (24) hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system.

V.A.7.b.(3). Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

V.A.7.b.(3)(a). If the collected material is discharged through a point source to United States water or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

V.A.7.b.(3)(b). If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.7.b.(3)(b). If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.7.b.(4). When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water.

V.A.7.b.(5). A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

V.A.7.b.(5)(a). For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

V.A.7.b.(5)(b). For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service.

V.A.7.b.(6). If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.7.b.(7). All leaks and spills shall be documented in the daily inspection log.

V.A.7.c Major Repairs

V.A.7.c.(1). The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

V.A.7.c.(2). Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

V.A.7.c.(3). The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 7 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

V.A.7.c.(4). The tank shall not be returned to service unless the Permittee has obtained a certification by an independent, Louisiana registered professional engineer that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification shall be submitted to the Department within seven (7) days of returning the tank system to use.

V.A.8. Air Emission Control Equipment Standards

The Hazardous Waste Tanks MS-431, MS-438, MS-603, MS-2230, MS-2303, MS-2207, GF-8189 A, GF-8189 B, GF-8189 C, GF-8189 D, GF 8189 E, MF-8638 A, MF-8638 B, MF-8638 C, MF-8603, MF-8616, MS-8632, and MF-8275 are in compliance with 40 CFR 63 Subpart G or Subpart H for operating air emission controls; therefore, they are exempt from the air control emission standards in LAC 33:V.1747-1799 and Condition V.H of this permit. In the event that the 40 CFR 63 Subpart G or Subpart H are no longer applicable to these tanks, the Permittee shall comply with LAC 33:V.1747-1799 and Condition V.H of this permit.

V.A.9. Recordkeeping

V.A.9.a. New Tanks

The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

V.A.9.b. Written Assessment

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. Assessments shall be updated at the time of submittal of the Permit Renewal Application and at any other time deemed necessary by the Department.

V.A.9.c. Inspections

V.A.9.c.(1). The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.6.(a)-(b) of this Permit.

V.A.9.c.(1)(a). The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, including temperature, pressures, and either levels or pump flows into and out of the tanks.

V.A.9.c.(1)(b). The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

V.A.9.c.(1)(c). Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(2). The Permittee shall document in the operating record all tests and inspections of overfilling controls.

V.A.9.c.(3). The Permittee shall keep on file at the facility the results of the internal and external inspections required by Condition V.A.6.(c)-(d) of this Permit. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(4). The Permittee shall keep on file all information related to tank thickness testing required under Condition V.A.6.(e) of this Permit.

V.A.9.c.(4)(a). This information shall include, at a minimum, the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

V.A.9.c.(4)(b). If an engineering evaluation is performed in accordance with Condition V.A.6.e.(4).b. of this Permit, the results of such an evaluation shall be kept in the operating record.

The engineering evaluation must include, at a minimum, details on how the evaluation was performed, references to

applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

V.A.9.c.(4)(c). Any tank thickness measurements that are averaged under Condition V.A.6.e.5 of this Permit must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of averaging. This information shall be kept as a part of the operating record for the facility.

V.A.9.d. Releases

V.A.9.d.(1). The Permittee shall keep on file at the facility, notification reports submitted under LAC 33:V.1913.D.

V.A.9.d.(2). Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak or spill to the Department's Single Point of Contact.

V.A.9.d.(3). Within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Department's Single Point of Contact:

V.A.9.d.(3).(a). Likely route of migration of the release,

V.A.9.d.(3).(b). Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate,

V.A.9.d.(3).(c). Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Department with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires,

V.A.9.d.(3)(d). Proximity of downgradient drinking water, surface water, and populated areas, and

V.A.9.d.(3)(e). A description of response actions taken or planned.

V.A.9.e. Repairs

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c of this Permit.

V.A.10. Closure and Post-Closure Care**V.A.10.a. Duty to Comply with LAC 33:V.1915.A**

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the Closure Plan, Attachment 1.

V.A.10.b. Duty to Comply with LAC 33:V.1915.B

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a of this Permit, the Permittee shall comply with LAC33:V.1915.B.

V.A.10.c. Post-Closure

The Permittee shall attempt to clean close all tank systems. If a tank cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Department that closure with the remaining contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

TABLE 7
Design and Operating Parameters for RCRA Tank Systems

Tank No.	Year Placed Into Service	Dimensions (D' X H')	Permitted Capacity (gallons)	Design Standard	Repair Standard	Inspection Standard	Design Temperature (°F)	Design Pressure Maximum/Minimum (PSIG)	Liquid Density at Operating Temperature	Materials of Construction	Design Shell Thickness (inches)	Corrosion Allowance (inches)	Minimum Shell Thickness (inches) ¹	Secondary Containment Type
MS-431	1965	12 X 14	15,200	ASME VIII Division I	NBIC ²	API 510	400	Vessel - 50/-5.2 Jacket - 40/FV	9.2	A 285 C FB Carbon Steel	Vessel - 0.4375 Head - 0.308 Jacket - 0.500	0.0625	Shell - 0.375 Head - 0.308 Jacket - 0.096	External Concrete Liner
MS-438	1965	5.5 X 14	2,630	ASME VIII Division I	NBIC	API 510	275	14	8.4	A 285 C FB Carbon Steel	Vessel - 0.3125 Head - 0.3125	0.0625	Shell - 0.048 Head - 0.085	External Concrete Liner
MS-603	1965	4.5 X 8.5	1,100	ASME VIII Division I	NBIC	API 510	325	Vessel-25 Jacket-40	8.4	A 285 C Carbon Steel	Vessel - 0.625 Jacket - 0.3125	0.0625	Shell - 0.291 Head - 0.206 Jacket - 0.100	External Concrete Liner
MS-2303	1978	4.5 X 8.5	1,100	ASME VIII Division I	NBIC	API 510	325	Vessel-25 Jacket-55/FV	9.2	A 285 C Carbon Steel	Vessel - 0.500 Jacket - 0.250	0.0625	Shell - 0.375 Head - 0.120 Jacket - 0.198	External Concrete Liner
MS-2207	1978	16 X 15	26,038	ASME VIII Division I	NBIC	API 510	Vessel-500 Jacket -400	Vessel-80/FV Jacket-60	7.5	SA 285 C Carbon Steel	Vessel - 1.25 Head - 1.058 Jacket - 0.5625	Shell - 0.125 Head - 0.062 Jacket - 0.0625	Shell - 0.6577 Head - 0.9938 Jacket - 0.500	External Concrete Liner
MS-2230	1978	8 X 8.5	3,200	API 620 1973 Edition, Supplement 3	API 653	API 653	150	Full of liquid + 1 PSIG	8.3	A 283 C Carbon Steel	Shell - 0.25 Roof - 0.3125	0.0625	Shell - 0.1875 Roof - 0.25	External Concrete Liner

Tank No.	Year Placed Into Service	Dimensions (D' X H')	Permitted Capacity (gallons)	Design Standard	Repair Standard	Inspection Standard	Design Temperature (°F)	Design Pressure Maximum /Minimum (PSIG)	Liquid Density at Operating Temperature	Materials of Construction	Design Shell Thickness (inches)	Corrosion Allowance (inches)	Minimum Shell Thickness (inches) ¹	Secondary Containment Type
MF-8603	1988	40 X 29.2	199,920	API 650	API 653	API 653	200	2/-1.5 oz.	8.4	Carbon Steel	Shell - 0.250 Roof -0.250	0.0625	Shell 1st - 0.164 2nd - 0.134 3rd - 0.100 4th - 0.100 5th - 0.100 Roof - 0.2143	External Concrete Liner/ Ringwall with 100 mil HPDE Liner
MF-8616	1988	40 X 29.2	199,920	API 650	API 653	API 653	200	2/-1.5 oz.	8.7	Carbon Steel	Shell - 0.250 Roof -0.250	0.0625	Shell 1st - 0.164 2nd - 0.134 3rd - 0.100 4th - 0.100 5th - 0.100 Roof - 0.2143	External Concrete Liner/ Ringwall with 100 mil HPDE Liner
MF-8638 A	1988	68.83 X 36	1,006,983	API 650	API 653	API 653	200	2/-1.5 oz.	8.6	SA 36 Modified Carbon Steel	Roof - 0.375 Shell 1st - 0.500 2nd - 0.375 3rd - 0.375 4th - 0.250 5th - 0.250 Floor - 0.750	Roof - 0.0313 Shell 1st - 0.0625 2nd - 0.0625 3rd - 0.0625 4th - 0.0625 5th - 0.0625 Floor - 0.437	Roof - 0.3437 Shell 1st - 0.352 2nd - 0.281 3rd - 0.189 4th - 0.125 5th - 0.100 Floor - 0.3125	External Concrete Liner/ Ringwall with 100 mil HPDE Liner

Tank No.	Year Placed Into Service	Dimensions (D' X H')	Permitted Capacity (gallons)	Design Standard	Repair Standard	Inspection Standard	Design Temperature (°F)	Design Pressure Maximum/Minimum (PSIG)	Liquid Density at Operating Temperature	Materials of Construction	Design Shell Thickness (inches)	Corrosion Allowance (inches)	Minimum Shell Thickness (inches) ¹	Secondary Containment Type
MF-8638 B	1988	69 X 36	1,006,983	API 650	API 653	API 653	200	2/-1.5 oz.	8.6	SA 36 Modified Carbon Steel	Roof - 0.375 Shell - 0.500 1st - 0.375 2nd - 0.375 3rd - 0.375 4th - 0.250 5th - 0.250 Floor - 0.750	Roof - 0.0313 Shell - 0.3437 1st - 0.0625 2nd - 0.0625 3rd - 0.0625 4th - 0.0625 5th - 0.0625 Floor - 0.0625 0.437	Roof - 0.3437 Shell - 0.352 1st - 0.281 2nd - 0.189 3rd - 0.125 4th - 0.100 5th - 0.100 Floor - 0.3125	External Concrete Liner/ Ringwall with 100 mil HPDE Liner
MF-8638 C	1988	68.9 X 36	1,006,983	API 650	API 653	API 653	200	2/-1.5 oz.	8.6	SA 36 Modified Carbon Steel	Roof - 0.375 Shell - 0.500 1st - 0.375 2nd - 0.375 3rd - 0.375 4th - 0.250 5th - 0.250 Floor - 0.750	Roof - 0.0313 Shell - 0.3437 1st - 0.0625 2nd - 0.0625 3rd - 0.0625 4th - 0.0625 5th - 0.0625 Floor - 0.0625 0.437	Roof - 0.3437 Shell - 0.352 1st - 0.281 2nd - 0.189 3rd - 0.125 4th - 0.100 5th - 0.100 Floor - 0.3125	External Concrete Liner/ Ringwall with 100 mil HPDE Liner
GF-8189 A	1978	10 X 6	2,395 liquid volume	ASME VIII Division 1	NBIC	API 510	250	FV to 225	8.6	SA 516 70N Carbon Steel	Shell - 1.00 Head - 1.375	Shell - 0.125 Head - 0.125	Shell - 0.7879 Head - 1.0426	External Concrete Liner

Tank No.	Year Placed Into Service	Dimensions (D' X H')	Permitted Capacity (gallons)	Design Standard	Repair Standard	Inspection Standard	Design Temperature (°F)	Design Pressure Maximum /Minimum (PSIG)	Liquid Density at Operating Temperature	Materials of Construction	Design Shell Thickness (inches)	Corrosion Allowance (inches)	Minimum Shell Thickness (inches) ¹	Secondary Containment Type
GF-8189 B	1978	10 X 6	2,395 liquid volume	ASME VIII Division 1	NBIC	API 510	250	FV to 225	8.6	SA 516 70N Carbon Steel	Shell - 1.00 Head - 1.375	Shell - 0.125 Head - 0.125	Shell - 0.7879 Head - 1.0426	External Concrete Liner
GF-8189 C	1978	10 X 6	2,395 liquid volume	ASME VIII Division 1	NBIC	API 510	250	FV to 225	8.6	SA 516 70N Carbon Steel	Shell - 1.00 Head - 1.375	Shell - 0.125 Head - 0.125	Shell - 0.7879 Head - 1.0426	External Concrete Liner
GF-8189 D	1978	10 X 6	2,395 liquid volume	ASME VIII Division 1	NBIC	API 510	250	FV to 225	8.6	SA 516 70N Carbon Steel	Shell - 1.00 Head - 1.375	Shell - 0.125 Head - 0.125	Shell - 0.7879 Head - 1.0426	External Concrete Liner
GF-8189 E	1999	10 X 6	2,395 liquid volume	ASME VIII Division 1	NBIC	API 510	250	FV to 225	8.6	SA 516 70N Carbon Steel	Shell - 1.00 Head - 1.375	Shell - 0.125 Head - 0.125	Shell - 0.7879 Head - 1.0426	External Concrete Liner
MS-8632	1988	15 X 20	32,200	API 620	NBIC	API 510	250	2/-1.5 oz.	8.6	SA 36 Carbon Steel	Top Head - 0.3125 Shell - 0.3125 Cone - 0.375 Bottom Head - 0.750	Top Head - 0.028 Shell - 0.0625 Shell - 0.0625 Cone - 0.0625 Bottom Head - 0.500	External Concrete Liner	
MS-8648	1988	3 X 5	280	ASME VIII Division 1 See Footnote 3	NBIC	API 510	200	2/-1.5 oz.	8.6	Carbon Steel	Top Head - 0.3125 Shell - 0.3125 Bottom Head - 0.750	Top Head - 0.250 Shell - 0.250 Bottom Head - 0.500	Top Head - 0.100 Shell - 0.100 Bottom Head - 0.100 (Minimum structural thickness)	External Concrete Liner

Tank No.	Year Placed Into Service	Dimensions (D' X H')	Permitted Capacity (gallons)	Design Standard	Repair Standard	Inspection Standard	Design Temperature (°F)	Design Pressure Maximum /Minimum (PSIG)	Liquid Density at Operating Temperature	Materials of Construction	Design Shell Thickness (inches)	Corrosion Allowance (inches)	Minimum Shell Thickness (inches) ¹	Secondary Containment Type
MF-8275	1988	29 X 40	199,406	API 650	API 653	API 653	200	2/-1.5 oz.	8.6	A 36 Modified Carbon Steel	Roof - 0.3124 Shell - 0.500 1st - 0.500 2nd - 0.500 3rd - 0.375 4th - 0.375 5th - 0.375 Floor - 0.750	Roof - 0.0625 Shell - 0.1558 1st - 0.1905 2nd - 0.0625 3rd - 0.0625 4th - 0.0625 5th - 0.0625 Floor - 0.0625 0.0625	Roof - 0.1558 Shell - 0.1905 2nd - 0.1555 3rd - 0.1204 4th - 0.1204 5th - 0.0503 Floor - 0.250	Double Walled Tank Concrete Shafts with 100 mil HPDE Liner

¹ Minimum required thickness determined by calculating the thickness required to adequately handle the design pressure and design temperature

² National Board Inspection Code

³ Tank MS-8648 was built to the design standard ASME VIII, Division 1, except its design pressure is lower than the lowest pressure (15 PSIG) covered by that code.

V.B. CONTAINER STORAGE

The Permit conditions as set forth under this Condition shall apply where applicable to the Permitted container storage facility as designated in Condition IV.B, Table 5. The container storage area is Permitted to store hazardous waste in properly labeled and sealed containers which have been specified for this purpose and are compatible with the contained waste. The 55-gallon drums shall be stored in accordance with LAC 33:V.2109.

The 55-gallon drums shall be stored on pallets stacked at a maximum of two (2) high and no more than four (4) large containers per tier on the pallet and conform to LAC 33.V.2109.B. The pallets shall be placed in rows with a minimum of two (2) feet of aisle space between rows.

- V.B.1.** The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.
- V.B.2.** The Permittee shall maintain all containers in accordance with LAC 33:V.2107.A.
- V.B.3.** The Permittee will assure the integrity of the containers in accordance with LAC 33:V.2105.
- V.B.4.** The Permittee must manage the containers in accordance with LAC 33:V.2107.A and B.
- V.B.5.** The Permittee must inspect the containers and storage areas in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the operating record in accordance with LAC 33:V.1529.B.8.
- V.B.6.** The Permittee shall store all wastes in containers that are compatible with the hazardous wastes and in accordance with DOT standards listed in 49 CFR 173 and 178.
- V.B.7.** The Permittee must maintain the containment storage area as required by LAC 33:V.2111.A, B.1, 2, 3, and 4.
- V.B.8.** The Permittee must manage spilled or leaked waste and accumulated precipitation according to LAC 33:V.2111.B.5.
- V.B.9.** The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. The Permittee must manage any collected storm water as required by LAC 33:V.2111.B.6 and any other applicable regulations.

- V.B.10.** The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.
- V.B.11.** The Permittee shall store hazardous waste in accordance with LAC 33:V.2109 and Condition IV.B of this Permit.
- V.B.12.** The Contingency Plan shall be activated when warranted by an emergency and reported as required by LAC 33:V.1513.
- V.B.13.** The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.
- V.B.14.** The Permittee must control and report all point source discharges according to LAC 33:V.1505.
- V.B.15.** The Permittee shall not exceed the maximum capacity listed under Condition IV.B of this Permit for each container storage area listed.
- V.B.16.** At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this Permit and as required by LAC 33:V.2117 and Chapter 35, Closure Requirements. Post-closure activities must be performed in accordance with the approved post-closure plan for the container storage area failing to achieve clean closure (or an alternate closure standard approved under LAC 33:V.3501.D.2. or LAC 33:V.3507.B.) within ninety (90) days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill.
- V.B.17.** The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.
- V.B.18.** The Permittee shall comply with the requirements set forth in LAC 33:V.1109.E and all applicable portions of LAC 33:V. Chapter 15 and Chapter 43 for the storage of containers in non-Permitted less than ninety (90) day container storage areas.

TABLE 8
Emission Controls for Containers

CONTAINER STORAGE AREA	LAC REFERENCE(S)	AIR EMISSION CONTROLS
Permitted Container Storage Area	LAC 33:V.1759.C, D, F, G, and H; LAC 33:V.1763-1767	Level 1 and Level 2 Controls

V.C. GENERAL REQUIREMENT FOR BOILERS

V.C.1. Permitted and Prohibited Wastes

V.C.1.a. The Permittee may only burn hazardous wastes with EPA waste codes listed in the current RCRA Subtitle C Hazardous Waste Permit Information Form (Part A Permit Application) except as prohibited in Condition V.C.1.b.

V.C.1.b. The burning of the following waste is prohibited:

V.C.1.b.(1). Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.C.1.b.(2). Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

V.C.1.b.(3). Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

V.C.1.b.(4). Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.C.1.b.(5). Municipal Waste.

V.C.1.b.(6). Containerized Gases.

V.C.1.b.(7). Medical/Infectious wastes as defined in 40 CFR 60.51.c.

V.C.1.b.(8). Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 14, except as described in LAC 33:V.2207.C.

V.D.1.b.(9). Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.C.1.c. Before burning any wastes not authorized under this permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.C.2. Inspections

V.C.2.a. Requirements

V.C.2.a.(1). The Permittee shall inspect the boilers and instrumentation in accordance with Table 9 of this Permit.

V.C.2.a.(2). The boilers and associated equipment (pumps, valves, pipes, fuel storage tanks, and other ancillary equipment) will be subject to a daily thorough, visual inspection, when they contain hazardous waste. The purpose of these inspections will be to identify leaks, spills, fugitive emissions, and signs of tampering. The automatic waste feed cut off system and associated alarms must be tested at least monthly when hazardous waste is burned to verify operability. Support for this demonstration shall be included in the operational record (LAC 33:V.3005 F.3 and F.4).

V.C.2.b. Records

V.C.2.b.(1). Written inspection records shall be part of the operating record for this Permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection, (2) inspector's name, (3) any inspection observations, and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

V.C.2.b.(2). A written record of the automatic waste feed cut-off system tests shall be part of the operating record for this Permit and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

V.C.3. Monitoring and Calibration

V.C.3.a. Requirements

V.C.3.a.(1). The continuous monitoring requirements shall be as specified in Tables 9-14 of this Permit.

V.C.3.a.(2). The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

V.C.3.a.(3). Monitoring samples and measurements shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V. Chapter 49. Appendix D or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised; *Standard Methods for the Examination of Water and Wastewater*, current edition, or equivalent methods.

V.C.3.a.(4). The Permittee must calibrate the equipment specified in Tables 10-14 according to the manufacturer's specifications. Calibration procedures shall be included in the operating record of the facility and available at all times for review by the Administrative Authority.

V.C.3.a.(5). Hazardous waste may continue to be introduced into the boilers during daily continuous emission monitoring system (CEMS) calibration check periods. The CEMS shall be maintained according to the following schedule: (1) at least daily, a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, a calibration error test; and (4) at least annually, a performance specification test. The procedures for CEMS maintenance are outlined in 40 CFR 266 Appendix IX Condition 2.0, "Performance Specifications for Continuous Emission Monitoring Systems."

V.C.3.b. Records

In the operating record, the Permittee shall record and maintain in accordance with LAC 33:V.1529 all monitoring data compiled to satisfy the Permit requirements. Minimum monitoring requirements are summarized in LAC 33:V.3005.F. In accordance with LAC 33:V.3005.F.2, all continuous monitors shall record data in units corresponding to the Permit limit unless otherwise specified in the Permit.

Electronic records may be maintained, in lieu of paper copies.

V.C.4. Performance Standards

V.C.4.a. Requirements

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is burned in the boilers (LAC 33:V.3009-3015).

V.C.4.a.(1). The boilers shall achieve a Destruction and Removal Efficiency (DRE) of 99.99 percent for each principal organic hazardous constituent (POHC). The DRE shall be determined by using the method specified in LAC 33:V.3009.A.

V.C.4.a.(2). The Permittee shall control hydrogen chloride (HCl) emissions such that the rate of emission from the stack is no greater than that specified in LAC 33:V.3015.

V.C.4.a.(3). The emissions of particulate matter shall not exceed 0.08 grains per dry standard cubic foot of stack gas, corrected to seven (7) percent oxygen by volume, in accordance with the formula specified in LAC 33:V.3011.

V.C.4.a.(4). The emissions of carbon monoxide, corrected to seven (7) percent oxygen, shall not exceed 100 parts per million by volume on an hourly rolling average in accordance with LAC 33:V.3009.B.

V.C.4.b. Records

The Permittee shall record in the facility operating record all occasions on which waste is fed to the boilers and when the operating limits specified in this Permit are exceeded.

Electronic records may be maintained, in lieu of paper copies.

V.C.5. Automatic Waste Feed Cut Off

V.C.5.a. Requirements

V.C.5.a.(1). The Permittee shall operate the systems specified in Tables 10-15 of this Permit to automatically cut off the hazardous waste feed when the monitored operating conditions deviate from the set points specified in the Permit.

V.C.5.a.(2). Operating parameters for which Permit limits are established must continue to be monitored following the cut off, and the hazardous waste feed shall not be restarted until the levels of those parameters that caused the automatic waste feed cut off are restored to Permit limits.

All other parameters must also be within Permit limits.

V.C.5.a.(3). In the event of a malfunction of the automatic waste feed cut off system, the Permittee shall immediately cut off and/or lock out the waste feed.

V.C.5.b. Records

V.C.5.b.(1). The Permittee shall record in the facility operating record the date and time of all automatic waste feed cut off events. The records shall also include the known or suspected cause of the automatic waste feed cut off, the triggering parameters, the corrective actions taken, the duration of the event, and the date and time of restarting waste feed following the automatic waste feed cut off.

Electronic records may be maintained, in lieu of paper copies.

V.C.5.b.(2). The Permittee shall record in the facility operating record all failures of the automatic waste feed cut off system, including the date and time of the failure, a description of the failure, root cause of the failure, and corrective actions taken.

V.C.5.b.(3). The operating record shall be maintained in an organized manner for a period of not less than three (3) years and be available at all times for inspection by the Administrative Authority. (LAC 33:V.3005.H)

V.C.6. Reports

The date, cause, and remedial action for each waste feed cut off activation shall be documented in the operating record. A summary of such occurrences must be included in the annual report. The Permittee shall report in writing to the Administrative Authority if there are more than fifty (50) Permit required waste feed cut offs for any boiler in a month. This report shall be due within thirty (30) days after the end of such month and shall include cause and remedial actions taken.

V.C.7. Regulation Of Residues

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

**TABLE 9
BOILER INSPECTIONS**

Equipment/Instrument	Inspection Elements	Inspection Frequency
Burner System	Leaks in manifold	Daily
Waste Feed System	Atomizing Fluid Pressure Transducer	Daily
	Waste Feed Pressure Transducer	Daily
	Waste Feed Flowmeter	Daily
Waste tank system	Tank Integrity	Daily
	Level Controls (Operability)	Monthly
	Overflow Alarms and Controls (Operability)	Monthly
	Secondary Containment	Daily
Boilers	Fugitive Emissions	Daily
	Refractory	Every Turnaround
Continuous Process Monitors	Out-of-tolerance Operational Data	Daily
Automatic Waste Feed Cut Off System(AWFCO) System ¹	Operability	Monthly

¹ Each boiler shall be subject to the provision for conducting inspections on each boiler's AWFCO system until the compliance date of the Boiler and Industrial Furnace (BIF) Maximum Achievable Control Technology (MACT) rule under 40 CFR 63 Subpart EEE.

V.D. SPECIFIC OPERATING CONDITIONS FOR THE ANILINE II BOILER

The Aniline 2 Boiler shall be subject to the following provisions and operating conditions until such time the Permittee conducts a Comprehensive Performance Test (CPT) in accordance with the Hazardous Waste Combustors Maximum Achievable Control Technology (HWC-MACT) timelines and requirements. After the Administrative Authority issues a Finding of Compliance on the results of the initial CPT, this permit will be modified and the provisions and operating conditions pertaining to the normal operation of the Aniline 2 Boiler will be transferred to the Permittee's Title V Air Permit.

V.D.1. Process Operating Conditions

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c)

V.D.1.a. Group A Parameter Limits

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established in Table 10 and below:

V.D.1.a.(1). Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 1,237 pounds per hour.

V.D.1.a.(2). Whenever hazardous waste is in the unit, the hourly rolling average combustion chamber temperature shall be maintained above the minimum value of 1769°F.

V.D.1.a.(3). Whenever hazardous waste is in the unit, the hourly rolling average combustion gas flow rate shall be maintained below a maximum value of 47,330 pounds per hour.

V.D.1.a.(4). Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven (7) percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

V.D.1.a.(5). Whenever hazardous waste is in the unit, the instantaneous baghouse differential pressure shall be no less than 0.25 inches of water column.

V.D.1.b. Group B Parameter Limits

The Permittee shall operate the boiler without exceeding these limits (see Table 11), although these limits are not part of the automatic waste feed cut off set points.

V.D.1.b.(1). The hourly rolling average production rate as raw material feed rate shall be no greater than 1,237 pounds per hour.

V.D.1.b.(2). The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 2.39 pounds per hour, hourly rolling average (Adjusted Tier 1).

V.D.1.b.(3). The hourly rolling average total ash feed rate shall be no greater than 38.07 pounds per hour.

V.D.1.b.(4). The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits:

Antimony (Adjusted Tier I) 1.79 pounds per hour

*Arsenic (Adjusted Tier I) 0.01 pounds per hour

Barium (Adjusted Tier I) 299.32 pounds per hour

*Beryllium (Adjusted Tier I) 0.03 pounds per hour

*Cadmium (Adjusted Tier I) 0.03 pounds per hour

*Chromium (Adjusted Tier I) 0.005 pounds per hour

Lead (Adjusted Tier I) 0.54 pounds per hour

Mercury (Adjusted Tier I) 1.79 pounds per hour

Silver (Adjusted Tier I) 17.96 pounds per hour

Thallium (Adjusted Tier I) 2.99 pounds per hour

*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Condition V.D.1.b.(4) shall not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^n \text{AFR}_{(i)} / \text{FRL}_{(i)} \leq 1.0$$

$\text{AFR}_{(i)}$ = Actual Feed Rate (AFR)
The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

N = Number of Carcinogenic Metals.

$$\text{FRL}_{(i)} = \frac{\text{Feed Rate Limit (FRL)}}{\text{The regulatory feed limit of carcinogenic metal (i) listed in V.D.1.b.(4)}}$$

V.D.1.b.(5). O₂ shall be monitored continuously whenever hazardous waste is in the industrial furnace, in accordance with CEMS regulations. O₂ level is provided as a correction factor, and as such, no limit is provided under this condition.

V.D.1.c. Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

V.D.1.c.(1). The instantaneous inlet baghouse temperature shall be no greater than 445°F.

V.D.1.c.(2). Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.D.1.c.(3). The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.D.1.c.(4). At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

V.D.1.c.(5). For a Continuous Monitoring System (CMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

V.D.1.c.(6). At a minimum, the Permittee shall analyze values from the Continuous Monitoring System (CMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements.

V.D.1.c.(7). Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily or document a continuous negative pressure in the combustion chamber.

TABLE 10
Group A Parameter Limits for the Aniline II Boiler
(Automatic Waste Feed Cut Offs)

CONTROL PARAMETER	FINAL OPERATING LIMITS AUTOMATIC WASTE FEED CUT OFF POINT
Maximum Hazardous Waste Feed Rate	1,237 lb/hr, hourly rolling average
Minimum Combustion Chamber Temperature	1,769°F, hourly rolling average
Maximum Combustion Gas Flow Rate	47,330 lb/hr, hourly rolling average
Maximum Stack Gas Carbon Monoxide	100 ppmv, corrected to 7% oxygen of a dry gas basis, hourly rolling average
Minimum Baghouse Differential Pressure	>0.25 in. w.c., instantaneous

TABLE 11
Group B & C Parameter Limits for the Aniline II Boiler

CONTROL PARAMETER	FINAL OPERATING LIMITS
Maximum Production Rate as Raw Material Feed Rate	1,237 lb/hr, hourly rolling average
Maximum Total Chloride and Chlorine Feed Rate (Adjusted Tier I)	2.39 lb/hr, hourly rolling average
Maximum Ash Feed Rate	38.07 lb/hr, hourly rolling average
Maximum Feed Rate of Antimony (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
*Maximum Feed Rate of Arsenic (Adjusted Tier I)	0.01 lb/hr, hourly rolling average
Maximum Feed Rate of Barium (Adjusted Tier I)	299.32 lb/hr, hourly rolling average
*Maximum Feed Rate of Beryllium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Cadmium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Chromium (Adjusted Tier I)	0.005 lb/hr, hourly rolling average
Maximum Feed Rate of Lead (Adjusted Tier I)	0.54 lb/hr, hourly rolling average
Maximum Feed Rate of Mercury (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
Maximum Feed Rate of Silver (Adjusted Tier I)	17.96 lb/hr, hourly rolling average
Maximum Feed Rate of Thallium (Adjusted Tier I)	2.99 lb/hr, hourly rolling average
Maximum Baghouse Inlet Temperature	445°F, instantaneous

V.E. SPECIFIC OPERATING CONDITIONS FOR THE DPA 1 SUPERHEATER

The DPA 1 Superheater shall be subject to the following provisions and operating conditions until such time the Permittee conducts a Comprehensive Performance Test (CPT) in accordance with the Hazardous Waste Combustors Maximum Achievable Control Technology (HWC-MACT) timelines and requirements. After the Administrative Authority issues a Finding of Compliance on the results of the initial CPT, this permit will be modified and the provisions and operating conditions pertaining to the normal operation of the DPA 1 Superheater will be transferred to the Permittee's Title V Air Permit.

V.E.1. Process Operating Conditions

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c)

V.E.1.a. Group A Parameter Limits

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established in Table 12 and below:

V.E.1.a.(1). Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 733 pounds per hour.

V.E.1.a.(2). Whenever hazardous waste is in the unit, the hourly rolling average combustion chamber temperature shall be maintained above the minimum value of 1849°F.

V.E.1.a.(3). Whenever hazardous waste is in the unit, the hourly rolling average combustion gas flow rate shall be maintained below a maximum of 24,530 pounds per hour.

V.E.1.a.(4). Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven (7) percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

V.E.1.b. Group B Parameter Limits

The Permittee shall operate the boiler without exceeding these limits (see Table 13), although these limits are not part of the automatic waste feed cut off set points

V.E.1.b.(1). The hourly rolling average production rate as heat input shall be no greater than 19.8 million British Thermal Units per hour (BTU/hr).

V.E.1.b.(2). The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 2.39 pounds per hour, hourly rolling average (Adjusted Tier 1).

V.E.1.b.(3). The hourly rolling average total ash feed rate shall be no greater than 1.18 pounds per hour.

V.E.1.b.(4). The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits:

Antimony (Adjusted Tier I) 1.79 pounds per hour

*Arsenic (Adjusted Tier I) 0.01 pounds per hour

Barium (Adjusted Tier I) 299.32 pounds per hour

*Beryllium (Adjusted Tier I) 0.03 pounds per hour

*Cadmium (Adjusted Tier I) 0.03 pounds per hour

*Chromium (Adjusted Tier I) 0.005 pounds per hour

Lead (Adjusted Tier I) 0.54 pounds per hour

Mercury (Adjusted Tier I) 1.79 pounds per hour

Silver (Adjusted Tier I) 17.96 pounds per hour

Thallium (Adjusted Tier I) 2.99 pounds per hour

*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Condition V.E.1.b.(4) shall not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^n \text{AFR}_{(i)} / \text{FRL}_{(i)} \leq 1.0$$

$\text{AFR}_{(i)}$ = **Actual Feed Rate (AFR)**
The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

N = Number of Carcinogenic Metals.

$\text{FRL}_{(i)}$ = **Feed Rate Limit (FRL)**
The regulatory feed limit of carcinogenic metal (i) listed in V.E.1.b.(4)

V.E.1.b.(5). O₂ shall be monitored continuously whenever hazardous waste is in the industrial furnace, in accordance with CEMS regulations. O₂ level is provided as a correction factor, and as such, no limit is provided under this condition.

V.E.1.c. Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

V.E.1.c.(1). Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.E.1.c.(2). The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.E.1.c.(3). At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

V.E.1.c.(4). For a Continuous Monitoring System (CMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

V.E.1.c.(5). At a minimum, the Permittee shall analyze values from the Continuous Monitoring System (CMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements.

V.E.1.c.(6). Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily or document a continuous negative pressure in the combustion chamber.

TABLE 12
Group A Parameter Limits for the DPA I Superheater
(Automatic Waste Feed Cut Offs)

CONTROL PARAMETER	FINAL OPERATING LIMITS AUTOMATIC WASTE FEED CUT OFF POINT
Maximum Hazardous Waste Feed Rate	733 lb/hr, hourly rolling average
Minimum Combustion Chamber Temperature	1,849°F, hourly rolling average
Maximum Combustion Gas Flow Rate	24,530 lb/hr, hourly rolling average
Maximum Stack Gas Carbon Monoxide	100 ppmv, corrected to 7% oxygen of a dry gas basis, hourly rolling average

TABLE 13
Group B & C Parameter Limits for the DPA I Superheater

CONTROL PARAMETER	FINAL OPERATING LIMITS
Maximum Production Rate as Heat Input	19.8 MMBTU/hr, hourly rolling average
Maximum Total Chloride and Chlorine Feed Rate (Adjusted Tier I)	2.39 lb/hr, hourly rolling average
Maximum Ash Feed Rate	1.18 lb/hr, hourly rolling average
Maximum Feed Rate of Antimony (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
*Maximum Feed Rate of Arsenic (Adjusted Tier I)	0.01 lb/hr, hourly rolling average
Maximum Feed Rate of Barium (Adjusted Tier I)	299.32 lb/hr, hourly rolling average
*Maximum Feed Rate of Beryllium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Cadmium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Chromium (Adjusted Tier I)	0.005 lb/hr, hourly rolling average
Maximum Feed Rate of Lead (Adjusted Tier I)	0.54 lb/hr, hourly rolling average
Maximum Feed Rate of Mercury (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
Maximum Feed Rate of Silver (Adjusted Tier I)	17.96 lb/hr, hourly rolling average
Maximum Feed Rate of Thallium (Adjusted Tier I)	2.99 lb/hr, hourly rolling average

V.F. SPECIFIC OPERATING CONDITIONS FOR THE DPA II SUPERHEATER

The DPA II Superheater shall be subject to the following provisions and operating conditions until such time the Permittee conducts a Comprehensive Performance Test (CPT) in accordance with the Hazardous Waste Combustors Maximum Achievable Control Technology (HWC-MACT) timelines and requirements. After the Administrative Authority issues a Finding of Compliance on the results of the initial CPT, this permit will be modified and the provisions and operating conditions pertaining to the normal operation of the DPA II Superheater will be transferred to the Permittee's Title V Air Permit.

V.F.1. Process Operating Conditions

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c).

V.F.1.a. Group A Parameter Limits

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established in Table 14 and below:

V.F.1.a.(1). Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 693 pounds per hour.

V.F.1.a.(2). Whenever hazardous waste is in the unit, the hourly rolling average combustion chamber temperature shall be maintained above the minimum value of 1,801°F.

V.F.1.a.(3). Whenever hazardous waste is in the unit, the hourly rolling average combustion gas flow rate shall be maintained below a maximum of 11,760 pounds per hour.

V.F.1.a.(4). Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven (7) percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

V.F.1.b. Group B Parameter Limits

The Permittee shall operate the boiler without exceeding these limits (see Table 15), although these limits are not part of the automatic waste feed cut off set points.

V.F.1.b.(1). The hourly rolling average production rate as heat input shall be no greater than 18.35 million British Thermal Units per hour (BTU/hr).

V.F.1.b.(2). The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 2.39 pounds per hour, hourly rolling average (Adjusted Tier 1).

V.F.1.b.(3). The hourly rolling average total ash feed rate shall be no greater than 1.66 pounds per hour.

V.F.1.b.(4). The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits:

Antimony (Adjusted Tier I) 1.79 pounds per hour

*Arsenic (Adjusted Tier I) 0.01 pounds per hour

Barium (Adjusted Tier I) 299.32 pounds per hour

*Beryllium (Adjusted Tier I) 0.03 pounds per hour

*Cadmium (Adjusted Tier I) 0.03 pounds per hour

*Chromium (Adjusted Tier I) 0.005 pounds per hour

Lead (Adjusted Tier I) 0.54 pounds per hour

Mercury (Adjusted Tier I) 1.79 pounds per hour

Silver (Adjusted Tier I) 17.96 pounds per hour

Thallium (Adjusted Tier I) 2.99 pounds per hour

*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Condition V.F.1.b.(4) shall not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^n \text{AFR}_i / \text{FRL}_i \leq 1.0$$

AFR_i = Actual Feed Rate (AFR)
The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

N = Number of Carcinogenic Metals.

FRL_i = Feed Rate Limit (FRL)
The regulatory feed limit of carcinogenic metal (i) listed in V.F.1.b.(4)

V.F.1.b.(5). O₂ shall be monitored continuously whenever hazardous waste is in the industrial furnace, in accordance with CEMS regulations. O₂ level is provided as a correction factor, and as such, no limit is provided under this condition.

V.F.1.c. Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

V.F.1.c.(1). Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.F.1.c.(2). The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.F.1.c.(3). At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

V.F.1.c.(4). For a Continuous Monitoring System (CMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

V.F.1.c.(5). At a minimum, the Permittee shall analyze values from the Continuous Monitoring System (CMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds to demonstrate compliance with the monitoring requirements.

V.F.1.a.(6). Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily or document a continuous negative pressure in the combustion chamber.

TABLE 14
Group A Parameter Limits for the DPA II Superheater
(Automatic Waste Feed Cut Offs)

CONTROL PARAMETER	FINAL OPERATING LIMITS AUTOMATIC WASTE FEED CUT OFF POINT
Maximum Hazardous Waste Feed Rate	693 lb/hr, hourly rolling average
Minimum Combustion Chamber Temperature	1,801°F, hourly rolling average
Maximum Combustion Gas Flow Rate	11,760 lb/hr, hourly rolling average
Maximum Stack Gas Carbon Monoxide	100 ppmv, corrected to 7% oxygen of a dry gas basis, hourly rolling average

TABLE 15
Group B & C Parameter Limits for the DPA II Superheater

CONTROL PARAMETER	FINAL OPERATING LIMITS
Maximum Production Rate as Heat Input	18.35 MMBTU/hr, hourly rolling average
Maximum Total Chloride and Chlorine Feed Rate (Adjusted Tier I)	2.39 lb/hr, hourly rolling average
Maximum Ash Feed Rate	1.66 lb/hr, hourly rolling average
Maximum Feed Rate of Antimony (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
*Maximum Feed Rate of Arsenic (Adjusted Tier I)	0.01 lb/hr, hourly rolling average
Maximum Feed Rate of Barium (Adjusted Tier I)	299.32 lb/hr, hourly rolling average
*Maximum Feed Rate of Beryllium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Cadmium (Adjusted Tier I)	0.03 lb/hr, hourly rolling average
*Maximum Feed Rate of Chromium (Adjusted Tier I)	0.005 lb/hr, hourly rolling average
Maximum Feed Rate of Lead (Adjusted Tier I)	0.54 lb/hr, hourly rolling average
Maximum Feed Rate of Mercury (Adjusted Tier I)	1.79 lb/hr, hourly rolling average
Maximum Feed Rate of Silver (Adjusted Tier I)	17.96 lb/hr, hourly rolling average
Maximum Feed Rate of Thallium (Adjusted Tier I)	2.99 lb/hr, hourly rolling average

V.G. RISK-BASED CONDITIONS

(RESERVED)

V.H. AIR EMISSION STANDARDS

V.H.1. Performance Standards for Equipment Leaks

The Permittee is demonstrating compliance with LAC 33:V.1717-1745 by complying with 40 CFR 63 Subpart H. In the event that 40 CFR 63 Subpart H becomes no longer applicable, the Permittee shall comply with LAC 33:V.1717-1745.

V.H.2. Standards for Container Storage Areas

The Permittee shall comply with the applicable requirements of LAC 33:V.1747-1799 for Container Storage Area No. 1, as listed in Table 8.

V.H.3. Standards for Tanks

The Permittee shall comply with the applicable requirements of LAC 33:V.1747-1799 for Tank MS-8648, as listed in Table 16.

TABLE 16
Emission Controls for Tanks

TANK	LAC REFERENCE(S)	AIR EMISSION CONTROLS
MS-8648	LAC 33:V.1755.A-C, J, and K; LAC 33:V.1763-1767	Level 1 Controls

VI. GROUND WATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 25, 27, 29, 30, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Control Act, R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for facilities that are used to treat, store, and dispose hazardous wastes at Rubicon, LLC in Geismar, LA. **No active regulated units are included in this Permit which are subject to Ground Water monitoring under LAC 33:V.3317, 3319 or 3321 at this time.**

VI.B. The Permittee shall comply with the monitoring, response, and corrective action provisions for the existing and any new systems in accordance with LAC 33:V.Chapter 33 and as outlined in Rubicon's Final Post-Closure Permit for the North and South Ponds (i.e., Condition VIII, (CAS)) to be issued at a later date.

VI.C. If ground water contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LAD008213191
AI#1468

DOCUMENT TYPE	APPLICATION/DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Financial Assurance	NA	NA	Updated Financial Assurance documentation shall be submitted in accordance with II.E.21.a.
Closure/Post-Closure cost estimates	4/22/08	36918041	Updated Closure/Post Closure cost estimates.
Closure/Post-Closure Plan	4/22/08	36918041	Updated Closure/Post-Closure Plan
Waste Analysis Plan	4/22/08	36918041	Updated Waste Analysis Plan
Contingency Plan	8/8/07	36179014	--
Inspection Schedule	8/8/07	36179014	--
Security Plan	6/25/08	37036241	Updated Security Plan
Training Plan	8/8/07	36179014	--
Arrangements with Local Authorities	3/3/08	36641720	Updated Arrangements with Local Authorities